

Public Hearing Transcript and DEIS Comments & Responses

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**Public Hearing Transcript
Wednesday, March 11, 2003
4:30 to 7:30 p.m.
Red Lion Colonial Hotel
Helena, MT**

Kim Gambrill: We want to go ahead and get started on the formal presentation and the opportunity for you to offer your comments and recommendations on the official record.

First, I want to thank all of you for coming tonight to the I-15 Corridor Draft Environmental Statement Public Hearing. Tonight's public hearing is the fourth in a series of public meetings designed to inform the public, share information about this Environmental Impact Statement process with you, and solicit your thoughts and recommendations for the improvements that you would like to see made along the corridor.

We have recently published the Draft Environmental Impact Statement (DEIS) for the I-15 corridor and what we will be doing in the next ten-to-fifteen minutes is talking briefly about this document, some of the information that is contained within it, and asking for your thoughts on what should be done to improve the I-15 corridor.

Before I continue with that part of the presentation, I would like to introduce a few people: my name is Kim Gambrill, I'm with the consulting firm Carter and Burgess in Denver. Our company has been hired to prepare the Environmental Impact Statement for this project. Larry Gibson is our Public Involvement Task Manager. He will be walking around with a microphone for those of you who would like to make comments tonight in that fashion. Also from Carter and Burgess is Craig Gaskill and Dave Woolfall, the Project Engineers who have been most instrumental in developing the traffic information and the alternatives that are analyzed in the DEIS. Troy Halouska and Amy Wiedeman are back at the registration table; they are Environmental Planners with Carter and Burgess and have been working with us throughout this project. Annell Fillinger, AM Tech Services here in Helena, will be recording the meeting tonight, and for those who would prefer not to speak before the entire group but would like to make verbal testimony on the project, you may go up to Annell after the presentation and have your comments recorded there. We have some representatives from the Department of Transportation. Mick Johnson and

Jason Giard from MDT's Great Falls District. Lesly Tribelhorn is here from the MDT Butte District. Mark Studt is MDT's Project Manager for the I-15 Corridor Study. Jerilee Weibel is here and will be able to answer any questions you may have on the Right-of-Way Acquisition Program or Relocation Assistance Program. From the Federal Highway Administration, Carl James, the Transportation Specialist who has been working with us from day one.

Tonight's proceedings are being tape recorded as part of the official record of the DEIS process. The draft EIS was made available for public review on February 14 and was placed in ten different locations around the area. The entire document is also available on our web site. The official public review period started the following week on February 21 when the official Notice of Availability was published in the Federal Register by the Environmental Protection Agency. That date began a 45-day public comment and review period, which ends on April 7th.

There are a number of ways for you to comment on the project. Tonight you can speak to the group and to those of us on the project team following my opening remarks. You may also speak with Annell individually after the formal presentation, or you can fill in a comment form which hopefully all of you received when you came in, and leave that with one of us or in one of the comment boxes at the back table. You may also send in written comments at any time between now and April 7th. You can do that on one of the comment sheets and mail it to the project public post office box or you can send your comments directly to Mark Studt at the address shown on the Newsletter. Again, the deadline for those written comments is April 7th.

Before asking for your comments on the project and on the alternatives, I want to briefly discuss a few important points. Within the Draft EIS, Chapter 1 discusses the Purpose and Need—why do we think improvements are necessary along this corridor. Purpose and Need is posted on the wall over here, it is found in the Executive Summary of the document and also in Chapter 1. I would like to read this:

"The purpose of the I-15 Corridor EIS project is to identify and evaluate potential transportation improvements that will accommodate anticipated traffic volumes safely and efficiently, while also facilitating the movement of east-west traffic crossing the interstate. The EIS addresses safety and

operating efficiencies at the existing I-15 interchanges and east-west roadways crossing I-15 and studies the need for additional interchanges and crossings. The roadways crossing I-15 were studied to the extent necessary to ensure their ability to collect and distribute anticipated traffic to, from and across I-15.”

The main focus of the study is on the I-15 corridor itself, from Montana City to Lincoln Road. Within the corridor we developed more than 30 potential transportation improvements - things that met the purpose and need and would be beneficial in addressing those needs. We eventually narrowed these down to two combinations of improvements that are presented in the Alternatives graphics behind me and also in the back of the room. We posted duplicate graphics in the back of the room so that if you were sitting and writing your comments out, you wouldn't have to wander back and forth. You could look at them back there while making your comments.

Chapter 2 of the Draft EIS fully describes the process we went through in looking at those alternatives, screening them, and then finding the final combinations that we wanted to present.

Both of the alternatives include a number of interchange improvements and some improvements that we call “supporting elements.” Together they make for very valuable improvements to the corridor. The DEIS presents three alternatives—two are what we call “build” alternatives. They are the combinations of improvements that we think are necessary. The third alternative presented in the DEIS is the “No-Action” Alternative or the “No-Build” Alternative. This is a description of what would be expected to happen in the corridor if none of these major improvements were made. This would be normal maintenance activities, emergency repairs and that sort of thing, and programmed projects that are already on the books to be done. We use that as a baseline for comparison so we can evaluate what the impacts of each of these two “build” alternatives would be.

The description of the baseline condition and the environmental conditions in the corridor are explained in Chapter 3.0 of the Draft EIS.

One of the major concerns with any project like this is private property and what it will take to do this project. No relocations are expected with this

project, but if you have concerns Jerilee Weibel from MDT is here to assist you.

Some frequently asked questions that we received; one has to do with who makes the final decision on what will be done in the corridor. That decision is made by the Montana Department of Transportation and the Federal Highway Administration. They will determine, sometime toward the middle to the end of April, what they believe the Preferred Alternative should be. They make that decision after very carefully reviewing and considering the information that is in the DEIS and the public comments and agency comments that we receive during this review period. Once that decision is made, we will begin preparing a Final EIS, which describes the Preferred Alternative and explains the justification for that decision. We think the FEIS will be completed by the end of June of this year. When that is completed, it will be placed out for a 30-day public review period. Following that period, MDT and Federal Highways will make a final decision on whether anything needs to be changed or whether the recommended alternative in the Final EIS is the one they want to go with. That final decision gets documented in a Record of Decision (ROD) which we think will be signed in the middle of September.

Another question we get is “when can the construction of some of these improvements actually begin?” That is a delicate balancing decision that MDT will make based on the needs in the corridor - the highest priority needs, the availability of funding, how long it would take to develop the final plans for the different improvements—so it is not an easy decision. We can't tell you today which will be first and which will be second. Those are decisions they will make with the Transportation Commission.

Another question we have gotten is, “what do we think the Preferred Alternative should be?” or “does MDT already know what they want to do and is the decision already made?” The answer to both of those is “no”. The decisions have not been made and we don't know what the Preferred Alternative is going to turn out to be. We need to listen to the comments, we need to see what the public feels is needed, we need to see what the state and federal agencies with responsibilities to oversee these kinds of projects have to say, and then we need to very carefully weigh those comments with the information that is included in the Draft EIS before making that decision.

At this time, we will open it up to comments. Again, if you are comfortable speaking before a large group, Larry has the hand-held microphone and he will give the microphone to you to make your comment. We would like you to focus your comments on your opinions of what should be done, your opinions perhaps on what should not be done, some justification, and keep your comments between one and two minutes. Any more than two minutes, I will have to cut you off. Again if you are not comfortable speaking before the group and you want to talk with Annell Fillingner at the conclusion of everybody else's remarks that is fine or use the comment sheet and leave your written comments with us. At this point, we will open it up and see who would like to make a comment about the Draft EIS alternatives.

TESTIMONY

Comment #1a: Robert Rule

My name is Robert Rule. I'm a developer here in Helena. First of all I would like to cover a few points. We live in a time of very unstable economic conditions. Our state government is in trouble, our city doesn't appear to be in trouble but take a look at your tax bill, we've got to come up with all the differences we are short on to pay our homeowners taxes. While Forestvale would be a very nice project for the sake of people being able to get around who live out there, what will that do for our economy? The Forestvale area has already been reflected in the City of Helena Growth Plan to be industrial/ commercial. There is no other area in Helena that doesn't have un-chopped up land. So the only logical sense is Custer Avenue. I've been working on a project for the last eleven months and recommend Custer Avenue because it will allow economic growth. It is the only area left with that city classification with those size lots. Custer Avenue is on the verge of irreversible growth. It is the only place to grow. It will grow pretty equal to what we see on Reserve Street in Missoula almost overnight. We are living in a time right now where the economic condition of Helena is either going to have to go up or down. We are going to have to allow it to go one way or the other and when it does go up, Custer is the only logical area for growth. The tax base created from this series of developments can and will give the county and state revenues that will enable Forestvale to be put in at a much quicker pace. Furthermore a re-routing of the frontage road that will access onto Custer

if we have a design that will line up with Washington Street allowing anybody living close to Washington Street the chance to come down the Frontage Road and get easy access without being required to re-enter on Montana Avenue.

Response to Comment #1a

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Comment #1b: Jeff Wuerl

I live just off Sierra Drive. Basically I'm for the Forestvale alternative and all of the above. Just a little history here - some twenty years ago my mother was approached by the Highway Department about putting an exit on Sierra Road. They studied that for God knows how long. She couldn't sell her land; she couldn't do anything with it. Then they decided it would bring too much traffic by Rossiter School and pulled the plug. Well, that is twenty years ago. It would have cost God knows how much less. So instead of everybody sitting on their thumbs, do it, the money is there, you've got the land paid for for Forestvale, get it over with.

Response to Comment #1b

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS. Alternative 1 includes the Custer interchange.

Comment #1c: Kathleen Gerl

I live at 700 Red Letter Street. It is important to me that this Environmental Impact Statement addresses the problems that will be created for the three schools on California Street - Smith School, the First Lutheran Church School, and Three Dogs Pre-school. Years ago my children walked down California in the street because there were no sidewalks. Efforts to put sidewalks in there were not fruitful; sidewalks still are not there. I don't think any of the streets between Montana and California have sidewalks. My grandchildren live five houses up the street from me. I would like them to be able to walk to school but because of the problem that the interchange will put traffic on Broadway that is not possible. So it is important to me that the EIS recognizes the hardship and point out the need for mitigating traffic spots with something.

The other thing in looking at this—I feel that without some exchange given, there is nothing in it for me. It takes me twenty minutes to get to Capital High School from my house. If I lived in Montana City it would be faster. Unless you put in a Custer Exchange I don't see that I will have anything but negative impacts.

Response to Comment #1c

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

All comments and responses will be sent to the agencies identified in Chapter 9.0 of the EIS for their consideration.

The DEIS compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway or other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway. Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. So, this taught us that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also taught us that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the growing employment base in the hospital area.

The new interchange at Custer Avenue is included in Alternative 1 which has been identified as the Preferred Alternative.

Comment #1d: Herbert George

I live at 2000 Broadway. I've heard rumors to the effect that Broadway is going to be made a one-way street or it is proposed. I received this (held up copy of the DEIS) through the mail just this afternoon and I haven't had an opportunity to study it. Is that being thought about or what about that? Will it be a one-way street? There has been real concern on Broadway, as you well know, about the increase of traffic in the Broadway neighborhood, and I noticed in the maps that Broadway is the only street that is up on the hill that is drawn into the study. Now there are other streets up there and it seems to me that it could be disbursed. If there is going to be traffic increase in that area, it could be dispersed over a wider area and some of the other streets could take a lot of the burden off Broadway.

Response to Comment #1d

(Kim Gambrill): One of the initial improvement options looked at was a one-way underpass at Broadway. That was screened out and it is not included in the alternative packages that are described in the EIS.

[Note: The above response was provided verbally at the Public Hearing.]

Our studies compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future, regardless of any improvements to I-15, to provide a substantial employment base at the east end of Broadway. As traffic gradually increases along one street, drivers will naturally tend to disperse to surrounding streets to their destinations. However, no measures are included with the I-15 Corridor improvements to deliberately disperse neighborhood traffic and, to the best of our knowledge, there are no plans to turn Broadway into a one-way street.

Comment #1e: Janice Frisch

I live on the west side. I think that as we are making changes to our city, the thing we need to think about the most is the safety and health of our citizens. That is who we are really here to take care of - the citizens. I don't know about you folks but when I see an ambulance sitting on an overpass, it makes me nervous. When I see someone trying to cross in those areas in the middle of winter at nighttime, it makes me nervous. When I see a kid trying to ride a bike over one of those, it is just terrifying. So it seems to me that Alternative One is the only one that starts to address some problems that we currently have. We shouldn't be focusing on causing more growth and making more problems when we haven't taken care of the infrastructure that we already have. We always want to jump ahead of ourselves so I'm supporting Alternative One or at least something that allows pedestrians in those two areas.

Response to Comment #1e

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS. Alternative 1 includes the Custer interchange. There are a number of features in the Preferred Alternative that address pedestrian use, such as the Broadway underpass.

Comment #1f: Tiffany Sauer

My mailing address is Clancy but I live two miles north of Montana City. I was going to do written comments but I'm going to put it out right now. What is affectionately known in our neighborhood as "the back road", the increase of traffic on that road in the last three years is incredible. The speed of traffic in the last three years on that road is incredible. I don't believe a proposed 55-mph, two-lane paved road on that side of the interstate is a good idea. There are existing homes in our neighborhood with children and little kids, there is whole mess of them coming up and those are their yards - that road. Is it possible, and I know in looking at the paper with the proposed Peccia subdivision on the east side, why not pave a road on the east side of the interstate? A frontage road as close to the interstate is possible there. Has anybody thought about that? The only reason I'm bringing it up in this large group is for somebody to think about it. There are no homes on that side right now but there are a lot of nice homes that have been built over the last three years on the west side. There is a concern about this feeding more traffic into the California neighborhood and the Broadway neighborhood. What if we went in on the east side with a 55-mph paved road and maintained a residential area on the west side and somehow hooked that up with whatever decent kind of Capital Exchange that will probably go in?

Response to Comment #1f

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the potential impacts of the proposed west side Frontage Road improvement.

In the early stages of developing potential transportation improvement options, other frontage road connections and locations were discussed. Completion of the west side Frontage Road between Montana City and Colonial Drive was identified as the only location that effectively addressed the purpose and need for the project as described in Chapter 1.0 of the Draft and Final EIS.

At this point in time, a frontage road on the east side of I-15 between Montana City and US 12 would not result in any appreciable improvements to safety or operating conditions on I-15, the existing interchanges, or the east-west roadways crossing I-15.

Our studies, which very carefully considered potential impacts to residential neighborhoods throughout the study area, do not indicate any significant changes in traffic volumes along Broadway or surrounding neighborhood streets when compared with the No-Action traffic volumes.

Comment #1g: Robert Dunlop

I live at 5820 North Montana Avenue. I am in favor of Forestvale Interchange. One gentleman spoke about his mother's dilemma and how she couldn't sell her property back in 1983. Actually all those people out in the valley were promised an interchange long before that. So I propose that you go ahead with Forestvale. Any of these other alternatives may or may not be alright, but if you choose them by the time you do the study for that actual interchange and then get the funding it could well be that some other group comes along such as Plan Helena and says that the current environmental impact statement is outdated and sets that project back again. So if you've got money for Forestvale and Forestvale is ready to go, let's do it and be done with and move on to the next project. Thank you.

Response to Comment #1g

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

When the original *North Helena Valley Interchange EIS* was completed in 1992, it identified Forestvale Road as the location for a new North Valley interchange. The Montana Department of Transportation fully intended to build this new interchange "as promised" but their decision was challenged in the courts. As discussed in Section 1.3 of the Draft and Final EIS, the Montana Supreme Court ruled that a new environmental study would be required before construction could begin on the Forestvale interchange. This new study has identified Custer Avenue as the location that best meets the purpose and need for the project.

The money that was held over from the original EIS is now available for other improvements identified in the Preferred Alternative. We are confident that the corridor improvements described in the Preferred Alternative will be underway in the very near future.

Comment #1h: Jerry Sorensen

I'm the Assistant Fire Chief with West Valley Volunteer Fire Department. I'm here to advocate the interchange at Forestvale for the reason of public safety. The freeway cuts right through West Valley's fire district. The only way we can access the valley right now is to go through Custer or to Lincoln Road. If there is an exchange put in at Custer Avenue, it is going to increase the time it will take to respond to any emergency in the valley. Most of the firefighters work in town and live in the valley and there is already too much time taken to get out to the valley and Custer Avenue is only going to increase that amount of time. I agree with Mr. Rule, economic development is important but in my opinion public safety is more important. The alternative for travel in the valley is to put a turn-lane in around Montana Avenue. The other term for a turn lane is "a suicide lane" and it is called that for a reason. I firmly believe that putting in turn lanes is going to increase the speed and the perceived confidence of the people who travel that and we are going to be getting a lot more traffic accidents, we are going to be able to respond less attractively for medical responses and for the traffic accidents the turn lane is going to cause and for fires. Again I would really urge looking at Forestvale.

Response to Comment #1h

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

The identification of Alternative 1 (Custer interchange) as the Preferred Alternative recognized that the benefits to the fire department with a Forestvale interchange would not be realized. The community considered numerous benefits and issues related to a number of subjects including traffic flow, preferred development areas, environmental impacts, land use impacts, and consideration of emergency response times. The Preferred Alternative (Alternative 1) meets the needs of most, but not all, of the jurisdictions and representatives involved in the decision-making process.

Comment #1i: Gary Burnham

I live on the east side of the valley. To me the most important thing here is to connect the west side of the interstate to the east side of the interstate because it kind of splits Helena in two. On the Forestvale alternative, I've never seen anybody address it and I see your alternative shows it in a "T", but the pictures in the paper showed Forestvale going east off the map. I just wondered if you would address the issue of where that would go and how it would connect the rest of the east side of the valley into York Road or Canyon Ferry Road if they did Forestvale? Or is it just planned to be a "T" into the Frontage Road and go nowhere? If you put it on Custer, which I believe is a better option; you've already got the east side of the valley connected. Thank you.

All the pictures in the paper this week showed it going past the Frontage Road and right off the map, so I thought I would ask.

Response to Comment #1i

(Kim Gambrill): Just a quick response to that. The DEIS does not anticipate an extension for Forestvale to the east, so it does "T" when it reaches the Frontage Road.

[Note: Above response provided verbally at the Public Hearing.]

Alternative 1 has been identified as the Preferred Alternative in the FEIS. Alternative 1 includes the Custer interchange.

Comment #1j: Bob Leach

I've lived in Helena since 1970 and when I first moved here I lived just off Sierra Road. My kids went to Rossiter School. I think the biggest problem we have is not the road or the highway, it is the poor planning by our County Commissioners and City Fathers who don't see the importance of having north-south traffic. When we have an east-west road, rather than take that road on through, they build a school on it. For example, the Four Georgians School on Custer where all of a sudden we have to slow down. I don't know about you but when they built that son-of-a-gun, I thought it was a clubhouse for the golf course. That is a stupid place for a school. And the land was given to them over on the north side but for some political reason or pressure from McHugh or somebody, they decided the kids in the trailer court shouldn't have to cross the street. Well, tough! They can cross the street. They could have put in an overpass for the kids to walk across if it was too dangerous. Poor planning. We have no north-south roads that connect and we have no east-west roads that connect. York Road is the stupidest cattle trail I have ever seen. If we don't start taking serious this idea of planned growth and make Forestvale go clear to Valley Drive or Wiley and right on to East Helena Drive if possible. If we don't start planning some roads that go on the other side of the road like the lady said, why doesn't Washington go right on up? That is poor planning. There is no planning in this crazy place. In 1975 I proposed a north bypass that would start on the other side of East Helena and come just the other side of Canyon Ferry Road and into town roughly where Target is now and go right on just north of the Fairgrounds, angle up and catch U.S. 12. I've never seen anybody laugh as hard as our County Commissioners did.

Response to Comment #1j

The Federal Highway Administration and the Montana Department of Transportation thank you for your positive comments on the EIS process

One of the issues that drew the greatest attention during the EIS process was the need to address long-range planning in a coordinated approach. Alternative 1 has been identified as the Preferred Alternative, in part, because of its greater compatibility with regional plans.

Another issue of concern evaluated in the DEIS was a possible bypass route for trucks. Traffic patterns were explored during the study, including the routes of trucks. Very few vehicles and trucks are trying to bypass Helena. Most drivers originate or have a destination in Helena.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

Comment #1k: Dewey Hahlbohm

I live about a mile from Shopko on the west side of Montana Avenue. I appreciate all the work you've done and the fact that you brought an impartial third party into this debate since it has been such an emotional issue here in the community. I've lived in Montana since 1980, and I've lived in Helena since 1995. I'm amazed at how difficult it is to get anything discussed without raising hackles. A couple of things I wanted to say - we either need to develop Custer now or acknowledge that it will never be developed just because of the commercial land there. Folks have got the properties for sale and they want to get rid of them, understandably. If Custer is done now, it will still provide us the opportunity to build Forestvale later. I think the retail development on Custer with the existing infrastructure just makes a lot of good sense to me. We've got arterials to feed it and there is a lot of developable land in that area that could still be constructed and I think there are a lot of folks who would want to see that happen, if there is an exchange put in there. It doesn't make sense to me to put an interchange at Forestvale now and rebuild the Custer overpass - in other words dismantle and rebuild the Custer overpass to accommodate the auxiliary lanes that are going to be built between Forestvale and Capital when we have the opportunity at the same time to make an interchange right there. The other thing brought up by this gentlemen, I think the idea of a northwest bypass to accommodate Great Falls to Garrison Junction traffic has a lot of merit to it. I think potentially in the future Forestvale may be that opportunity to do that via Green Meadow or some other route. Let's not take away the opportunity for growth in the community.

Response to Comment #1k

The Federal Highway Administration and the Montana Department of Transportation thank you for your positive comments on the EIS process.

After very careful analysis, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS. One of the more important factors analyzed during the Draft and Final EIS development was the issue of anticipated growth and its associated impacts.

If a new interchange is constructed at Custer Avenue as recommended in the Final EIS, the Forestvale location can still be considered in the future. A separate environmental study would be required at that time.

The issue of a northern bypass was studied during the development of the DEIS but our analysis showed that very few vehicles, including trucks, are trying to bypass Helena. Most drivers originate or have destinations in Helena.

**Comment #2:
Helena City Commission &
Lewis & Clark County Board of Commissioners**



City of Helena
Lewis and Clark County
316 North Park
Helena, MT 59623



March 19, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
PO Box 201001
Helena MT 59620-1001

Dear Mr. Studt:

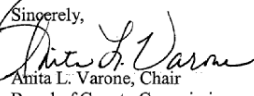
After reviewing the Interstate 15 Corridor draft environmental impact statement, the Helena City Commission and the Lewis & Clark County Board of Commissioners unanimously recommend Alternative 1, the major components of which are:

- New interchange at Custer Avenue, including the widening of Custer Avenue to four lanes between N. Montana Avenue and N. Washington Street. We strongly encourage this project begin as soon as possible.
- New interchange at South Helena
- Interchange improvements at Capitol

Other components, to name a few, include safety improvements to the Lincoln Interchange and improvements to the frontage road between Montana City and Helena. As well, we recommend the Montana Department of Transportation retain the Forestvale right-of-way for future interchange construction as the Helena Valley continues to grow.

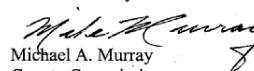
We extend our compliments to the many people who spent countless hours on this extensive and important effort for our community. Carter-Burgess conducted the entire process in an exemplary manner and is also to be commended.

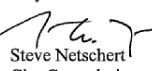
Sincerely,


Amita L. Varone, Chair
Board of County Commissioners


Jim Smith
Mayor

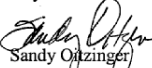

Marc Parriman
City Commissioner


Michael A. Murray
County Commissioner


Steve Netschert
City Commissioner


Tom Pouliot
City Commissioner


Ed Tinsley
County Commissioner


Sandy Oltzinger
City Commissioner

Response to Comment #2

The Federal Highway Administration and the Montana Department of Transportation thank the city of Helena and Lewis & Clark County for your involvement and positive comments on the EIS process followed on this project. Your input is critical to the success of this project.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

**Comment #3:
John F. Wardell USEPA**

Comment #3 continued



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

March 27, 2003

Mr. Mark Studt, P.E.
Project Manager
Montana Dept. of Transportation
2701 Prospect Ave.
Helena, MT 59620-9746

Re: EPA Comments on Draft Environmental Impact
Statement for the I-15 Corridor From Montana City
to Lincoln Road

Dear Mr. Studt:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement for improvements along the Interstate-15 Corridor from Montana City to Lincoln Road. The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. The EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document. A summary of EPA's EIS rating system is enclosed for your information.

The EPA supports the purposes of the proposed Interstate Highway 15 transportation improvements to accommodate traffic volumes safely and efficiently, while also facilitating east-west traffic crossing the interstate. The EPA does not have objections to selection of either of the proposed major alternative packages of transportation improvements (i.e., Alternative 1 or Alternative 2) as the preferred alternative, however, it appears to us that Alternative 1 would have a reduced level of environmental impacts in comparison to Alternative 2. Accordingly, EPA recommends selection of Alternative 1 as the preferred alternative. This conclusion is based on our evaluation and comparison of estimated environmental impacts, which are discussed in our more detailed comments (see copy enclosed).

We also believe that several of the recommendations of the Greater Helena Area 2001 Transportation Development Plan Update (DEIS, page 3-38), that are pertinent to I-15 transportation issues, should be supported or considered for inclusion as elements with the preferred alternative. Several of the Helena Transportation Plan Update recommendations would promote increased utilization and support for transit improvements and transportation demand management (TDM), and we believe it would be appropriate to include these as supporting

elements for the preferred alternative. These include: 1) develop aggressive marketing plan for dial-a-ride to increase ridership; 2) implement transit service between East Helena and Helena, and between Helena and Helena Valley; 3) encourage carpooling and ridesharing within Helena, and from Jefferson County; 4) operate Checkpoint from both directions; and 5) expand service hours of dial-a-ride.

The DEIS states that transit and TDM elements were not recommended as supporting elements of the proposed transportation improvements because there was limited use and availability of public transit or TDM programs and little public support for public transit or TDM. We believe it is important for the State and Federal highway transportation agencies to show leadership and be proactive in encouraging increased utilization and support for transit improvements and TDM, rather than to simply accept the status quo as a situation that can not be changed. Public support for transit improvements and TDM may increase if they are made more available and are more aggressively promoted or marketed.

The EPA has concerns regarding direct and indirect environmental impacts associated with construction of proposed transportation improvements, although it does appear that appropriate mitigation measures are identified to mitigate most of the direct environmental impacts of the proposed transportation improvements. The indirect impacts, including growth inducing effects and induced changes in the pattern of land use, population density, growth rate, and related effects on air and water and natural systems, including ecosystems, are more difficult to mitigate. Highway interchanges can significantly induce (or accelerate) growth and development and land use changes near the interchanges, and can significantly affect property values near the interchanges.

The indirect effects of the new interchanges may best be mitigated by local government efforts to control the location of growth and development and reduce environmental impacts through local planning by stipulating in zoning and land use plans that development occur in designated growth areas, and integrating and coordinating land use planning with transportation and environmental planning and review. EPA encourages utilization of "smart growth" concepts to minimize effects of growth and development on the environment, and proper planning and design of new infrastructure (see <http://www.epa.gov/smartgrowth/>). Local government infrastructure costs, including roads, can be significantly reduced by smart growth planning concepts. We are enclosing with these comments a Smart Growth Framework document that was prepared for analyzing smart growth in the context of an I-15 improvement project near St. George, Utah where there were similar concerns about indirect and cumulative effects associated with growth and development related to transportation improvements. Although local planning decisions are outside the authority of State and Federal Highway Transportation Agencies a chapter describing economic, social, and environmental benefits that could be realized from smart growth planning concepts is being inserted into the I-15 Southern Corridor Project EIS in Utah to encourage and promote such planning concepts.

We also believe it is important to develop a specific detailed Wetland Mitigation Plan that will compensate for lost wetland functions and values that will occur during project construction. This Wetland Mitigation Plan should be developed when a preferred alternative is

Comment #3 continued

selected, and should be approved by the regulatory and resource management agencies before implementation of the proposed project. We encourage inclusion of a summary of the Wetland Mitigation Plan in the FEIS (perhaps as an appendix). We also encourage consultation with the Montana Interagency Highway Wetlands Group for wetland mitigation efforts to facilitate interagency agreement on the proposed mitigation plan for replacement of wetland functions and values.

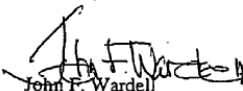
Finally, we recommend that MDOT contact the Montana Dept. of Environmental Quality (MDEQ) to ensure MDEQ concurrence that proposed I-15 improvements will be consistent with MDEQ's development of Total Maximum Daily Loads (TMDLs) and water quality restoration plans for Tenmile Creek and Silver Creek, which are listed as impaired waters (i.e., listed under Section 303(d) of the Clean Water Act), and may be potentially affected by proposed transportation improvements with Alternative 2. We suggest that Carole Mackin of MDEQ in Helena be contacted at 444-7425.

We are enclosing our additional and/or more detailed comments, questions, and concerns regarding this DEIS for your review and consideration. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the I-15 Corridor Montana City to Lincoln Road DEIS has been rated as Category EC-2 (Environmental Concerns - Insufficient Information). A copy of EPA's rating criteria is attached.

Our environmental concerns regard the need to select an alternative that minimizes potential direct and indirect environmental impacts, and include proactive efforts to promote transit improvements and transportation demand management. We also recommend development of a detailed wetland mitigation plan, and consultation with the MDEQ to assure concurrence on proposed transportation improvements with TMDL development for Tenmile Creek and Silver Creek.

If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at (406) 329-3313. Thank you for your consideration.

Sincerely,


John F. Wardell
Director
Montana Office

Enclosures

cc: Cynthia Cody/Julia Johnson, EPA, 8EPA-N, Denver
Todd Tillinger, COE, Helena

Dale Paulson, Program Development Engineer, FHWA, Helena
Scott Jackson, USFWS, Helena
Robert Rav/Carole Mackin/Jeff Rvan. MDEQ. Helena

Comment #3 continued

**U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO -- Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC -- Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO -- Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU -- Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 -- Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 -- Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 -- Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Comment #3 continued

**EPA Comments on the Draft Environmental Impact
Statement for the I-15 Corridor From Montana City to
Lincoln Road**

Brief Project Overview:

The Montana Dept. of Transportation (MDT) and Federal Highway Administration (FHWA) have evaluated proposed improvements to Interstate Highway 15 in the Helena Valley from Montana City to Lincoln road (approximately 12 miles). The project purpose and need is to accommodate traffic volumes safely and efficiently, while also facilitating east-west traffic crossing the interstate. Increased traffic has decreased operating efficiency of I-15, interchanges, and east-west roadways, which serve and cross I-15. I-15 has a 31% higher than average interstate crash rate, and has become a barrier to east-west travel, limiting mobility of cars, trucks, busses, pedestrians, bicycles, and emergency response vehicles.

The DEIS evaluates the no action alternative, which includes the transportation, development and infrastructure projects already in progress or that are programmed. In addition, more than 30 transportation improvement options were identified and evaluated. These options were refined, combined and compared, and distilled into two major alternative packages of transportation improvements. A preferred alternative is not identified in the DEIS. Alternative 1 with estimated costs from \$100 to \$125 million includes:

- New interchange at South Helena
- Interchange improvements at existing Capitol interchange
- New interchange at Custer Avenue and widening of Custer Avenue to four lanes between N. Montana Avenue and N. Washington Street
- Construction of two auxiliary lanes (each direction) on I-15 between Custer and Capitol interchanges
- Minor realignment of east side Frontage Road
- Lincoln interchange improvements
- Montana City interchange improvements
- Connect east side Frontage Road between Montana City and Colonial Drive
- Widen Cedar Street to five lanes from I-15 to N. Montana Avenue
- Broadway underpass for pedestrian and bicycle use

Alternative 2 with estimated costs from \$93 to \$121 million includes:

- New interchange at South Helena
- Interchange improvements at existing Capitol interchange
- New northern Interchange at Forestvale Road
- Construction of an auxiliary lane (each direction) on I-15 between Forestvale Road and Capitol interchange plus a second auxiliary lane (each direction) between Cedar and

Comment #3 continued

- Capitol interchange, including replacement of the existing Custer Avenue bridge
- Minor realignment of east side Frontage Road
- Lincoln interchange improvements
- Montana City interchange improvements
- Connect east side Frontage Road between Montana City and Colonial Drive
- Widen Cedar Street to five lanes from I-15 to N. Montana Avenue
- Broadway underpass for pedestrian and bicycle use

Comment:

1. Thank you for providing descriptions of corridor background, existing roadway and bridge deficiencies, traffic volume and safety issues (Chapter 1). This information is helpful for explaining the purpose and need for the project to the public, and providing a context for understanding alternative development. It is also very helpful to describe and provide information on all the potential transportation improvements that were considered (page 2-8) and evaluated vs. screening criteria.
2. Transit improvements (i.e., identify transit routes, park-and-ride locations) and transportation demand management (TDM) elements (i.e., flex time work schedules, carpool incentives, shuttle/van pools, etc., to reduce traffic) were not recommended as supporting elements with the build alternatives. The DEIS, however, does state that transit improvements and TDM elements are supported and compatible with all recommended improvements (Table 2-3). These transit and TDM elements were screened out because it was stated that there was limited use and availability of public transit or TDM programs and little public support for public transit or TDM.

We note that several of the recommendations shown (page 3-38) for the Greater Helena Area 2001 Transportation Development Plan Update are pertinent to the I-15 transportation issues, and several of these recommendations would promote increased utilization and support for transit improvements and TDM. We believe some of these recommendations should be supported or considered for inclusion as elements with the preferred alternative (e.g., develop aggressive marketing plan for dial-a-ride to increase ridership; implement transit service between East Helena and Helena, and between Helena and Helena Valley; encourage carpooling and ridesharing within Helena and from Jefferson County; operate Checkpoint from both directions; expand service hours of dial-a-ride).

We believe it is important for the State and Federal highway transportation agencies to show leadership, and be proactive in encouraging increased utilization and support for transit improvements and TDM, rather than to simply accept the status quo as a situation that can not be changed. Public support for transit improvements and TDM may increase if they are made more available and are more aggressively marketed and/or promoted.

Comment #3 continued

Also, new highway interchanges can change land use and the face of the landscape, and promote urban sprawl and loss of rural character, and contribute to the loss of the very values people seek in an area. Road projects often result in induced growth effects and stimulate increased use of privately owned vehicles and vehicle miles traveled. This in turn, leads to increased auto dependency. We believe elements to promote public transit and TDM should be included with the preferred alternative in an attempt to help mitigate these effects.

3. The EPA does not have objections to selection of either of the major alternative packages of transportation improvements as the preferred alternative (i.e., Alternative 1 or Alternative 2), however, it appears to us that Alternative 1 would have a reduced level of environmental impacts in comparison to Alternative 2. This conclusion is based on our evaluation and comparison of estimated environmental impacts as disclosed in the DEIS, which are itemized and discussed below.

- ⇒ The DEIS states that the area around Custer Avenue is currently zoned, and that Alternative 1 would not cause a change to this zoning (page 5-4), and that induced development near the proposed Custer interchange would be consistent with the current urban area zoning and land use character near Custer Avenue. The area around Forestvale, however, is not zoned by either the City of Helena or Lewis & Clark County, so there may be fewer controls on induced growth and development associated with Alternative 2. Undeveloped land near the Forestvale interchange would have a greater likelihood of being developed in the near term with Alternative 2, and this could change the current rural land use character near the Forestvale interchange (page 5-5). Also, the new Forestvale Road would bring traffic through an area where there is little traffic presently, and a new interchange at Forestvale may have more influence on the shifting of new land use growth (page 5-39).
- ⇒ The DEIS states that improvements associated with the proposed new Custer Avenue interchange in Alternative 1 would have no direct effects on surface water quality, (page 5-32) whereas the proposed Forestvale interchange in Alternative 2 could result in direct impacts to water quality in Ten Mile Creek, which is listed by the Montana DEQ as water quality impaired (i.e., 303(d) listed stream), and potential indirect growth induced effects to Silver Creek (also a 303(d) listed stream). Potential indirect effects of Alternative 2 may also include induced growth in the floodplains of both Tenmile Creek and Silver Creek (page 5-49).
- ⇒ The DEIS states that direct wetland impacts along with indirect wetland losses as a result of potential future adjacent interchange development could impact 3.8 acres of wetland habitat near the proposed Custer Avenue interchange (Alternative 1), whereas it is estimated that the proposed Forestvale interchange (Alternative 2) could impact 7 acres of wetland habitat (Pages 5-37, 5-38).

Comment #3 continued

- ⇒ There is a higher potential for seismic impacts to the proposed new Forestvale interchange (Alternative 2) due to proximity of the Forestvale interchange to Ten Mile Creek and Lake Helena (page 5-7).
 - ⇒ The potential for direct impacts to threatened and endangered species and their habitat is slightly higher with Alternative 2 than Alternative 1 due to the greater likelihood of bald eagle use near the proposed Forestvale interchange location and Tenmile Creek and the presence of black-tailed prairie dogs in the north Helena Valley (page 5-52).
 - ⇒ The estimated increase in vehicle miles traveled for Alternative 1 (13%) is slightly less than for Alternative 2 (15.5%), and the estimated decrease in vehicle hours traveled is slightly more for Alternative 1 (1.9%) than for Alternative 2 (1.6%). This result implies a small potential air quality benefit for Alternative 1 over Alternative 2 (i.e., slightly reduced carbon monoxide and hydrocarbon emissions).
 - ⇒ The direct impacts to important farmland would be greater with Alternative 1 (62 acres) than with Alternative 2 (23 acres). However, indirect growth and induced and accelerated land use change from Alternative 2 may tend to increase the relative farmland impacts of Alternative 2. Also, Alternative 2 would directly impact 0.1 acre of prime farmland, whereas Alternative 1 would have no direct impact on prime farmland (page 5-9).
4. The EPA fully supports the proposed inclusion of pedestrian/bicycle facilities at the new proposed interchanges and reconstructed Capitol interchange, and the Broadway underpass.
 5. The EPA has concerns regarding direct and indirect environmental impacts associated with construction of proposed transportation improvements, although it does appear that appropriate mitigation measures are identified to mitigate most of the direct environmental impacts of the proposed transportation improvements.

The indirect impacts, including growth inducing effects and induced changes in the pattern of land use, population density, growth rate, and related effects on air and water and natural systems, including ecosystems, are more difficult to mitigate. Projects that improve traffic flow and eliminate congestion also may increase access to undeveloped areas and contribute to induced residential, commercial, and industrial growth. In many situations, one can argue that this type of growth is an inevitable, natural progression, however, induced residential, commercial, and industrial growth and *increased rates of growth* can adversely affect water quality, wetlands, wildlife habitat loss and fragmentation, farm land and other natural resources. As noted above, new highway interchanges can change land use and the face of the landscape, and promote urban sprawl and loss of rural character, and contribute to the loss of the very values people

Comment #3 continued

seek in an area. Road projects often result in induced growth effects and stimulate increased use of privately owned vehicles and vehicle miles traveled. This in turn, leads to increased auto dependency. This is one reason why we believe elements to promote public transit and TDM should be included with the preferred alternative in an attempt to help mitigate these effects.

EPA also fully supports and encourages local government efforts to control the location of development and reduce environmental impacts through the local planning process, by means such as stipulating in zoning and land use plans that development occur in designated growth areas, and integrating and coordinating land use planning with transportation and environmental planning and review. EPA encourages utilization of "smart growth" concepts to minimize effects of growth and development on the environment and proper planning and design of new infrastructure (see <http://www.epa.gov/smartgrowth/>).

Local government infrastructure costs, including roads, can be significantly reduced by smart growth planning concepts. We are enclosing with these comments a Smart Growth Framework document that was prepared for analyzing smart growth in the context of an I-15 improvement project near St. George, Utah where there were similar concerns about indirect and cumulative effects associated with growth and development related to transportation improvements. Although local planning decisions are outside the authority of State and Federal Highway Transportation Agencies a chapter describing economic, social, and environmental benefits that could be realized from smart growth planning concepts is being inserted into the I-15 Southern Corridor Project EIS in Utah to encourage and promote such planning concepts.

6. We are pleased to see the discussion of water resources and water quality mitigation measures (pages 5-35, 5-36) indicating that BMPs would be implemented and a storm water management plan developed to reduce and control highway runoff, sedimentation and pollutant loading.
7. Tenmile Creek and Silver Creek are listed by the Montana DEQ on the State Clean Water Act 303(d) list as not supporting aquatic life and drinking water beneficial uses with probable causes identified as arsenic, cadmium, copper, lead, mercury, metals, other habitat alterations, turbidity, and zinc; and pollution sources identified as silviculture, logging road construction and/or maintenance, resource extraction, acid mine drainage, and abandoned mining. Stream segments designated as "water quality impaired" and/or "threatened" listed on State 303(d) lists require development of a Total Maximum Daily Load (TMDL). A TMDL:

Identifies the maximum load of a pollutant (e.g., sediment, nutrient, metal) a waterbody is able to assimilate and fully support its designated uses; allocates portions of the

Comment #3 continued

maximum load to all sources; identifies the necessary controls that may be implemented voluntarily or through regulatory means; and describes a monitoring plan and associated corrective feedback loop to insure that uses are fully supported; or can also be viewed as, the total amount of pollutant that a water body may receive from all sources without exceeding Water Quality Standards (WQS); or may be viewed as, a reduction in pollutant loading that results in meeting WQS.

It is important that proposed transportation improvement activities avoid further degradation of impaired waters, and be consistent with TMDLs and associated water quality restoration plans to restore water quality and support of beneficial uses. While the proposed water quality mitigation efforts for the proposed road improvement project (pages 5-35, 5-68, 5-87) appear appropriate, we believe it is important to contact the Montana DEQ to ensure their concurrence that proposed I-15 improvements will be consistent with their TMDL and water quality restoration plan development for these impaired waters in the highway corridor (e.g., contact Carol Mackin of MDEQ in Helena at 444-7425). This issue is most relevant if Alternative 2 were selected, since it would result in potential direct impacts to Tenmile Creek and indirect impacts to both Tenmile and Silver Creeks.

We also support the conduct of watershed or aquatic habitat restoration activities to compensate for past impacts of highways to aquatic resources, particularly in watersheds with 303(d) listed waters where highways may have contributed to aquatic impairments through past channelization, riverine or floodplain encroachments, sediment delivery during construction, and other activities that may have affected channel stability, water quality, aquatic habitat, and designated waterbody uses. It would be appropriate for MDOT to work with the MDEQ as it develops Total Maximum Daily Loads (TMDLs) and associated water quality restoration plans (e.g., contact Robert Ray or Jeff Ryan of MDEQ at 444-5319 or 444-4626, respectively).

8. It is our understanding that the bridge over Tenmile Creek would be widened with Alternative 2. If Alternative 2 is selected it will be important to assure that the bridge design accommodate flood flows with no substantial changes to flood elevations, and bridge designs should match hydraulic traits of the natural stream. We also support that the stated precaution (page 5-47), to take special care to avoid impacts to riparian vegetation in the Tenmile Creek area.

We note that bedload transport should also be an important design criterion for bridges (and culverts) to avoid sediment deposition above stream crossings or scour below stream crossings. We support provision of an adequate span on bridge crossings to minimize encroachment upon the river channel, riparian area, and floodplain. We note that size and configuration of bridges can be modified to reduce floodplain encroachment (e.g., construction of bridges on pilings, as opposed to fill, can reduce encroachment). Bridges or open bottom arch culverts that allow natural stream bed substrate and stream grade,

Comment #3 continued

and sufficient width and capacity to pass flood flows and bedload transport with minimal encroachment upon the river channel and riparian area are preferred. Bridges with wide spans also afford opportunities for wildlife passage, and reduced wildlife-vehicle collisions. We also recommend that all culverts simulate the natural stream grade and substrate as much as possible. We also support the conduct of bridge construction work during periods of low stream flow (page 5-48), although it is our understanding that construction would occur without impacting the stream channel (page 5-45).

In regard to permits needed for bridge work, the Army Corps of Engineers, U.S. Fish & Wildlife Service, EPA, Montana Dept. of Fish, Wildlife and Parks and Montana Dept. of Environmental Quality should all be contacted to assure that proper authorizations and permits are obtained prior to construction (e.g., 404 permits, 310 or 124 permits, short term turbidity exemptions, etc.). We suggest contacting Todd Tillinger of the Corps of Engineers in Helena at 406-441-1375; Jeff Ryan of the MDEQ at 406-444-4626; and Scott Jackson of the USFWS in Helena at 406-449-5225, and Kristine Knutson of EPA at 406-457-5021.

9. We are pleased to see the analysis and disclosure of potential impacts to wetlands (starting on page 5-36). We very much support proposals to minimize impacts to wetlands, particularly the storm water detention ponds north of K-Mart and the gravel pit near the proposed Forestvale interchange (page 5-41).

The goal of wetland mitigation should be to replace the functions and values of lost wetlands in areas adjacent to or as close as possible to the area of wetlands loss. EPA/Corps policy has accepted acre-for-acre replacement of wetlands as a surrogate for replacement of functions and values when there is a lack of definitive information on functions and values, although adjustments may be necessary to reflect the expected degree of success of mitigation, and provide an adequate margin of safety (i.e., greater than acre-for-acre replacement is suggested when impacted wetlands have high function & value and likelihood of replacement is low).

When a preferred alternative is identified in the FEIS, we recommend that a specific detailed Wetland Mitigation Plan be prepared that provides for adequate replacement of lost wetland functions and values. This Plan should be approved by the appropriate agencies before implementation of the proposed project. We recommend that the Plan contain a statement of goals, a monitoring plan, long-term management/protection objectives and a commitment to conduct additional work, if required, to meet the goals of the Plan. We also encourage consultation with the Montana Interagency Highway Wetlands Group for this proposed wetland mitigation project to facilitate interagency agreement on the proposed mitigation plan for replacement of wetland functions and values. We encourage inclusion of a summary of the Wetland Mitigation Plan in the FEIS (perhaps as an appendix).

Comment #3 continued

10. The analysis and disclosure of noise impacts in Chapter 5 is confusing (pages 5-21 to 5-28). We found it difficult to ascertain whether there is a particular noise impact advantage for Alternative 1 or Alternative 2. We suggest that the noise impact assessment be clarified to more clearly identify relative noise impacts of the alternatives.
11. We are pleased to see the discussion of noxious weed management. EPA supports control of noxious weeds, which are a great threat to biodiversity, and can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there are ground disturbances such as construction. We support plans to revegetate (reseed with native grass mix) disturbed areas. Where no native, rapid cover seed source exists, we recommend using a grass mixture that does not include aggressive grasses such as smooth brome, thereby allowing native species to eventually prevail. Mr. Phil Johnson, Botanist, Montana Dept. of Transportation, in Helena at 406-444-7657, may be able to provide guidance on revegetation with native grasses.
12. We recommend that the Air Quality Section (page 5-19) contain either a statement on the primary wind direction for this area or possibly provide a windrose representative of the area if one is available. This will assist in providing to the public improved understanding of the direction of flow of any air pollutants generated by highway construction or highway vehicle usage.

Comment #3 continued

**A Framework for Analyzing Smart Growth
in the Context of the I-15 Southern Corridor Project in St. George, Utah**

The *secondary and cumulative impacts* of transportation projects such as the proposed I-15 Southern Corridor consist principally of those environmental, social and economic changes brought about by the development of lands made more accessible by the project. While development of these lands may well occur in any event, it generally happens in more accelerated fashion when new highways such as the I-15 Southern Corridor open access to previously inaccessible areas. *Induced development* is a component of transportation projects such as the I-15 Southern Corridor and consists of development that would not be otherwise as likely or as desirable absent a new corridor. The environmental, economic, and social impacts of induced development have both secondary and cumulative aspects within the context of the National Environmental Policy Act (NEPA).

Accelerated growth – made possible by improved transportation and access – quickens greatly the build-out of infrastructure and the increase in population over what would otherwise occur in an unplanned, transport/access-limited scenario. This is especially the case in areas where growth is already desirable, with or without improved transportation access. The faster growth and development occurs, the less opportunity there is to plan for this growth in ways that minimize the economic, social, and environmental consequences of rapid, less-planned development.

The secondary and cumulative impacts of growth will be qualitatively similar under a business-as-usual (non-smart growth) scenario, with or without the proposed Southern Corridor. That is, there will be a variety of predictable environmental, social, and economic impacts as land is transformed from present to future uses. These impacts result from development that occurs in conformance with current municipal development plans, codes, zoning requirements and other ordinances, as well as builder and developer practices and preferences. However, the impacts of growth and development under a “build” alternative, occurring as a result of improved access to hitherto inaccessible areas, will be more amplified and accelerated than under a “no build” alternative.

Communities nationwide are beginning to implement plans, principles, financing mechanisms, and other policy tools to create a future in which the impacts of business-as-usual growth and development are mitigated if not avoided entirely. This type of growth and development is sometimes called “smart growth,” or “sustainable development,” or “new community design.” It is growth that simultaneously achieves economic prosperity, strong neighborhoods and quality of life, and healthy and sustainable ecosystems as the underpinning of both economic and social vitality. As an alternative to business-as-usual, this form of growth is one that must be designed for, planned, supported, and executed with a high degree of collaboration among entrepreneurs, citizens, and government. A departure from business-as-usual will not likely occur by accident.

The impacts of business-as-usual and what is called smart growth are significantly different both in intensity and scale, as well as magnitude over time. The consequences of a

Comment #3 continued

“smart growth” scenario in the evaluation of secondary and cumulative impacts within a new highway project such as the I-15 Southern Corridor are measurably different and allow community planners and decision makers an opportunity to compare two very different scenarios for both types of impacts.

Principles of a smart growth scenario include:

- + efficiency in the consumptive use of water and minimization of the qualitative impacts of development on surface and ground waters;
- + efficiency, durability, and effectiveness over time of waste water and drinking water infrastructure
- + minimization of the impacts of consumptive water use on ecosystems and habitats;
- + utilization of compact neighborhood and building designs together with the integration of mixed use zoning principles to optimize both near and long-term infrastructure costs (utilities, schools, health care), avoid air quality compliance issues, and reduce the unit costs of public service provision (police, fire, refuse, road maintenance); fiscal cost savings to government increases the potential net fiscal benefit of growth as efficient government imposes fewer burdens on taxpayers;
- + protection of habitat and species unique to a bio-region both to ensure compliance with applicable laws and to maximize the quality of life and frequently the economic value represented by the proximity of diverse natural systems;
- + creation of a range of housing opportunities and choices consistent with expected demographics of incoming populations, together with walkable neighborhoods, which help create a strong sense of place and livability;
- + provision of a variety of transportation options to future residents and workers to minimize the costs of time lost to increased traffic, congestion, and transit, and to anticipate the mobility needs of an older average population (should retirement populations constitute the main form of in-migration);
- + preservation of open space, farmland, natural beauty, archaeological, historical, and cultural resources to maximize diversity of experiences and enhance quality of life for new residents, employers, and workers;
- + maximization of ecosystem integrity by avoiding fragmentation of critical habitats and natural systems
- + efficiency in the use of energy in all buildings and infrastructure using energy efficient design concepts and new technologies based on renewable sources of energy; and

Comment #3 continued

+ optimization in the use of materials for construction and infrastructure development, saving on cost for developers, purchasers, and government.

Smart Growth Scenario:

In a smart growth scenario, the secondary and cumulative impacts to be evaluated and compared with those in a business-as-usual scenario can be based on some reasonably accepted estimate for future population growth (i.e. 150,000 new residents/30,000 new households by 2030) in the region to be served by the project. These impacts and how they might be measured include:

- the difference in per household water consumption as a result of using advanced water efficient technologies, landscaping practices, and water and wastewater management principles across all sectors (residential, commercial, industrial, recreational); the difference can be measured in volume/gallons per household/person per day as well as the unit cost of service including supply acquisition, storage, delivery, and system operation and maintenance.
- the difference in projected infrastructure (wastewater, drinking water, solid waste landfill) size and costs (capital and operation/maintenance) as a result of land use design, building efficiency characteristics (materials, energy, water) and landscape features under "smart growth" codes, standards, ordinances, and zoning requirements versus those currently in place in the towns and counties to experience accelerated growth as a consequence of the highway.
- the extent to which natural landscape, open spaces and parks, and species habitat are fragmented under the "smart growth versus business-as-usual scenarios; this can be measured in total and contiguous acres as well as other indicators suggested by resource and land management agencies.
- the difference in per household energy consumption as a result of using current building and energy codes and standards versus those of programs such as Energy Star Buildings, Leadership in Energy and Environmental Design, and Partnership for Advanced Technology in Housing; the difference can be measured by 1) air quality impacts (emissions) based on current and future utility generation and fuel mix percentages and emission factors for those fuels for those fuels and generation technologies, or 2) the cost differential per household for energy efficient design and end-use efficiency based on kWh ratings of standard vs. more efficient technologies and designs.
- the extent to which mixed-use zoning is permitted under smart growth and business-as-usual scenarios; this can be measured in terms of the number and extent of zoning rules permitting versus prohibiting mixed use development as well as acres of developable land on which mixed-use zoning is either prohibited or permitted; current rules can be compared to what might be reasonably expected/possible in the way of

Comment #3 continued

mixed-use under a smart growth scenario as evidenced by the latest community consideration of zoning/code/plan changes.

- the extent to which growth or development boundaries are established and maintained within the area expected to be affected by the highway; this can be measured by the presence or absence of existing growth boundaries as represented by zones in which development is excluded vs. permitted/anticipated

Response to Comment #3

Response to Comment #3 (continued)



Montana Department of Transportation

2701 Prospect Avenue
PO Box 201001
Helena MT 59620-1001

David A. Galt, Director
Judy Martz, Governor

MASTER FILE
COPY

October 7, 2003

John F. Wardell
Director
U.S. Environmental Protection Agency
Region 8, Montana Office
Federal Building
10 West 15th Street, Suite 3200
Helena, MT 59626

Dear Mr. Wardell:

Thank you for your constructive and insightful comments on the Draft EIS for the I-15 Corridor (Montana City to Lincoln Road). We also thank you for clearly stating your recommendation for a Preferred Alternative. After carefully considering all comments received and the analysis presented in the Draft EIS, Alternative 1 has been selected as the Preferred Alternative.

We would like to respond to your comments in the order presented in the attachment to your March 27 letter.

1. We thank you for this positive feedback on the background information provided in the Draft EIS.
2. The initial range of supporting elements identified in the Draft EIS included both transit improvements and Transportation Demand Management (TDM) strategies. As noted in Chapter 2.0 of the DEIS, these options were not included in either of the build alternatives, primarily because they would have done very little to address the existing and projected needs in the corridor and they received minimal public support relative to other proposed improvements.

The specific transit system deficiencies included in the 2001 Transportation Development Plan Update that appear on page 3-38 of the DEIS are not improvements that should be addressed by the Montana Department of Transportation. These are issues that need to be solved at the local level or through private investment. Nonetheless, it is our belief that the open and inclusive public involvement process we followed for the I-15 Corridor EIS has raised awareness within the community for several important issues, including the importance of transit and TDM. The Preferred Alternative reduces the likelihood of urban sprawl making implementation of TDM and transit improvements by local jurisdictions more viable. The Final EIS will include a discussion on smart growth initiatives in the cumulative impacts mitigation section that local planning jurisdictions could implement. In addition, Section 4.11 of the FEIS provides a discussion on alternate modes of travel and recommends action by local planning jurisdictions.

Mr. John F. Wardell, USEPA

October 7, 2003

page 2 of 4

3. As stated above, Alternative 1 has been selected as the Preferred Alternative for many reasons, including those you cited in your thoughtful comments.
4. We have made a concerted effort to address pedestrian and bicycle issues throughout the I-15 project corridor. From the very start of our public involvement activities the need for improved safety and facilities for pedestrians and bicyclists was raised as a major concern within the community. Improved pedestrian and bicycle facilities are a part of all new interchanges and interchange improvements associated with the Preferred Alternative (Alternative 1). The improvements presented in the Final EIS are compatible with the Non-Motorized Transportation Plan currently being developed.
5. Anticipated growth in the Helena Valley is acknowledged throughout the Draft EIS as one of the major distinguishing features for comparing the two build alternatives and the No-Action Alternative. Since Alternative 1 (the Preferred Alternative) is adjacent to city limits and is in a designated Urban Area, it will contribute less to urban sprawl. Even under the No-Action scenario, growth is expected to occur in these areas. Chapter 5.0 of the DEIS includes a fairly lengthy discussion of anticipated growth and potential cumulative impacts. This discussion has been expanded for the Final EIS to specifically reference "smart growth" but a separate chapter devoted to this topic will not be included in the document. We consider the expanded discussion to be informative and appropriate for this particular project. TDM measures are discussed extensively in Section 4.11 and are not precluded by the construction of the Preferred Alternative. However, implementation of the TDM measures falls primarily under the jurisdiction of local and regional planning agencies.
6. Thank you for this comment on water resources and water quality. We have tried to address all environmental issues in a complete and responsible manner.
7. The Montana Department of Environmental Quality has been involved in the development of the I-15 Corridor EIS through participation on the project Interdisciplinary Team and through meetings and coordination phone calls. We received no comments from MDEQ on the Draft EIS but will continue to coordinate with them on water quality issues associated with this project. With the selection of Alternative 1 as the Preferred Alternative there will be no anticipated direct or indirect impacts to either Silver Creek or Tenmile Creek or floodplains. Any permits required for construction will be coordinated with the appropriate jurisdiction, including MDEQ (see Section 5.3.22 of the FEIS).
8. With the selection of Alternative 1 as the Preferred Alternative, the bridges over Tenmile Creek will not be widened or disturbed. No further coordination is required. Any permits required for construction will be coordinated with the appropriate jurisdiction, including MDEQ (see Section 5.3.22 of the FEIS). If Alternative 2 is selected in the ROD as the alternative to construct, then the issues you mention related to bridge design will need to be considered in the final design.
9. FHWA and MDT are fully committed to avoiding and minimizing impacts to wetlands and to the adequate replacement of lost wetland functions and values resulting from this project.

Response to Comment #3 (continued)

Mr. John F. Wardell, USEPA
October 7, 2003
page 3 of 4

At this time, individual corridor improvements have not been prioritized for construction so the timing of wetland mitigation needs is undetermined. In addition, MDT is currently involved in a coordinated multi-agency planning effort to identify mitigation reserves in the Helena Valley. Therefore, we believe the appropriate time to develop a Wetland Mitigation Plan for the I-15 Corridor project will be sometime following the completion of the Final EIS. Environmental impacts were reevaluated to account for changes made in the conceptual design of the FEIS Preferred Alternative. Wetland impacts have been reduced to 1.2 acres with none identified as Corps jurisdictional. Upon final design, MDT will coordinate with appropriate agencies including the Montana Interagency Highway Wetlands Group.

10. The Noise Impact Assessment section of the DEIS (Section 5.10) has been reorganized and rewritten for the FEIS.
11. Thank you for the positive feedback on the noxious weed discussion included in the Draft EIS. MDT's botanist has provided additional clarifying language for the Final EIS concerning mitigation plantings.
12. No windrose data exists for this study area by information on wind direction has been added to the Air Quality discussion in the FEIS.
13. Regarding statements made in Comment #2 and other places in your comment letter, we would like to clarify our understanding and position regarding transportation effects to growth. Many things have to fall into place before an area will grow, and from our experience in Montana, it is not the road that causes the growth; rather it is often the other way around. There are several examples where interchanges have not resulted in additional growth, other than the improved road or access.

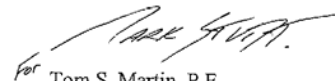
The factors we understand to be required for growth include a strong economic base, interest rates, the price of gas, availability and price of building supplies, new industry or services, availability of housing, and personal preferences. There is a very complex set of conditions that can lead to growth or its absence, and there is no clear way to absolutely say that growth inevitably follows from a new interchange. We believe this project is different from the St. George example cited in your letter since our alternatives are not proposing access to "inaccessible areas." We fully considered such impacts and concluded that there will not be additional development in the area as a whole, but that there may be some redirection of growth. Also, with no interstate access between Cedar and Lincoln Road, the Helena Valley area has grown quite rapidly, so again, it isn't the interchanges that are causing the growth.

Response to Comment #3 (continued)

Mr. John F. Wardell, USEPA
October 7, 2003
page 4 of 4

We anticipated the release of the Final Environmental Impact Statement in early November. I hope you will find that your comments have been addressed to your satisfaction. If you have any questions about our environmental documentation or programs, please call me at your convenience.

Sincerely,



for Tom S. Martin, P.E.
Consultant Design Engineer

TSM:mjs:EPA_DEISCOMMENTREPLY1

Enclosures

copies: Mick Johnson, P.E. – MDT Great Falls District Administrator	w/ attachment
David M. Hill, Chief, Environmental Services Bureau	"
Carl S. Peil, P.E., Preconstruction Engineer	"
FHWA	"
✓ Tom Martin, P.E. – MDT Consultant Design Engineer	"
Preconstruction File	"

Comment #4: David Leitheiser

Comment #4 continued

Studt, Mark

From: Ebert, Jeff
Sent: Friday, February 14, 2003 4:44 PM
To: Leitheiser, David; Studt, Mark; 'Gambrell, Kim M.'
Subject: RE: Capitol Interchange - Helena

Dave,
I am forwarding this e-mail to Mark Studt and Kim Gambrell. Mark is MDT's consultant design contact and Kim is the project manager for Carter-Burgess, the consultant doing the EIS. They will make sure your comments are included.

Jeff

-----Original Message-----

From: Leitheiser, David
Sent: Friday, February 14, 2003 3:59 PM
To: Ebert, Jeff
Subject: RE: Capitol Interchange - Helena

Thanks Jeff,
How do I get these comments included?
Dave

-----Original Message-----

From: Ebert, Jeff
Sent: Friday, February 14, 2003 3:40 PM
To: Leitheiser, David
Cc: Johnson, Mick; Giard, Jason
Subject: RE: Capitol Interchange - Helena

Dave,
Thanks for your comment. The I-15 Draft EIS that is now out for comment addresses your concerns with respect to the Capitol Interchange. The DEIS describes short term and long term improvements to the Interchange that will be presented for comment at a public hearing on March 11th. Once the DEIS has been presented and all the public comment is addressed, a Final EIS and ultimately a Record of Decision will be issued. The FEIS and ROD will drive what improvements will be implemented.

Two alternatives are being studied and both alternatives include improvements to the Capitol Interchange. The Great Falls District will be nominating and developing the projects that are Lewis and Clark County whereas, we will take care of any projects that are in Jefferson County that are listed as part of the FEIS and ROD. Until that EIS process is complete we can't do any improvements other than routine maintenance through the limits of the study area which begins near the Montana City Interchange and extends north to the Lincoln Interchange.

Jeff

-----Original Message-----

From: Leitheiser, David
Sent: Friday, February 14, 2003 12:46 PM
To: Ebert, Jeff
Cc: Leitheiser, David
Subject: Capitol Interchange - Helena

Jeff,

As a member of the driving public I have a comment. I use the Capitol Interchange daily coming in from to the south, from Clancy. The interchange is precarious whether I am trying to go east or west, more so when going east towards MDT headquarters. You can not tell which lane the traffic you're trying to merge with is in and cars stop in the merge lane to wait to get over to the Wal-Mart turn bay. I have heard that modifications are in the planning or design stage. Is this true? I vote for fixing it ASAP.

Thanks,
David A. Leitheiser
(406) 444-7225
dleitheiser@state.mt.us

Response to Comment #4

The Federal Highway Administration and the Montana Department of Transportation thank you for your comments on the I-15 Corridor EIS. Major improvements to the Capitol interchange are included in Alternative 1 which has been identified as the Preferred Alternative in the FEIS. At this point, no schedule has been set for designing or implementing the improvements at the Capitol interchange.

Comment #5: Bruce A. Duenkler

February 22, 2003

Mark Studt, PE
Project Manager
Montana Dept of Transportation
2710 Prospect Ave
Helena MT 59601

RE: I-15 Corridor

Dear Mr. Studt:


In view of the way Helena has developed in recent years, it seems to me that it should be self evident that an interchange is needed at Custer Avenue for the following reasons:

1. The current overpass is extremely narrow and dangerous
2. Better and safer access to the continuously expanding commercial development of the area
3. Provide access to the east, west and north valley areas via Custer, Canyon Ferry, York and Frontage roads

If an additional interchange is to be built I would advocate the south Helena area.

In any case additional improvements to relieve congestion on Fee Street would be needed at the Capitol interchange.

Respectfully submitted,


Bruce A Duenkler
2728 Belt View Dr
Helena MT 59601

Response to Comment #5

The Federal Highway Administration and the Montana Department of Transportation thank you for your comments on the I-15 Corridor EIS.

Alternative 1 (Custer Avenue interchange, South Helena interchange, and improvements at Capitol interchange) has been identified as the Preferred Alternative in the FEIS for many reasons, including those you listed.

Comment #6: Dave Cole

Studdt, Mark

From: Cole, Dave
Sent: Wednesday, March 05, 2003 3:21 PM
To: Studdt, Mark
Subject: I - 15 DEIS

My understanding is that MDT itself concluded that the Forestvale interchange wasn't going to accomplish much in terms of traffic management, relative to its cost, and that's why they questioned the location themselves, originally. (Page 1-5: "However, additional traffic engineering studies that were completed during this same time period [1997] raised questions about the overall effectiveness of the new interchange in improving traffic congestion in the North Valley, particularly along N. Montana Avenue and at the Capitol interchange." Also, a Forestvale interchange would put tremendous development pressure on a relatively undeveloped area of agricultural land with known problems due to sheet flooding from Ten Mile Creek and high groundwater.

In contrast, a Custer interchange would provide access to and encourage development in an area immediately adjacent to the city and existing growth. It would improve access to and from the southeast Helena Valley Transitional Growth Area that the new Lewis & Clark County Growth Policy has already identified for more growth. It would substantially improve access for recreationists traveling to Hauser and Canyon Ferry reservoirs, particularly for those coming into the valley on I -15 from the north or south. It would also improve access to the Helena National Forest on the east side of the Missouri via York Road and York Bridge and via Canyon Ferry Road and across Canyon Ferry Dam. To me, if the choice is one or the other, the broader public benefit, short-term and long-term, is served by building a new interchange at Custer. I think that alternative is also more consistent with the vision for valley growth and development reflected in the county growth policy.

Cole, Dave Properties

General | Organization | Phone/Notes | Member Of | E-mail Addresses

Name

First: Dave Initials: Last: Cole

Display: Cole, Dave Alias: CC5114

Address: Title:

City: Helena Company: DOC

State: Department: CDEV

Zip code: Office: 301 S. Park

Country: Assistant: Phone: 841-2776

Add to: Personal Address Book

OK Cancel Apply

Response to Comment #6

The Federal Highway Administration and the Montana Department of Transportation thank you for your comments on the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS for many reasons, including those you listed.

Comment #7: Sue Hoell

Studdt, Mark

From: MacDonald, Tracey S. [MacDonaldTS@c-b.com]
Sent: Wednesday, March 12, 2003 1:13 PM
To: Mark Studdt (E-mail); Gambrell, Kim M.; Bell, Diana L.
Subject: FW: I-15 corridor DEIS-comment

FYI

I will have this added to our comment tracking for the DEIS.

Tracey

-----Original Message-----

From: Sue Hoell [mailto:s.hoell@attbi.com]
Sent: Saturday, March 08, 2003 4:48 PM
To: MacDonald, Tracey S.
Subject: I-15 corridor DEIS-comment

I reviewed the DEIS on the Internet and wish to commend the writer on doing an excellent job on a complex assignment.

I live and work in Helena and use I-15 regularly. I'm a local real estate appraiser familiar with some of the properties that would be affected by Alternative 1 or Alternative 2. I have no personal interest in any of those properties, but prefer Alternative 2 (Forestvale) because of the inconvenience of access to and from properties between Cedar and Lincoln Road. Custer is near enough to Cedar that the area is already easily accessed. The Custer area is less likely to be benefited by a new access considering the existing airport, waste water treatment plant, and other industrial uses already accessed from both Highway 12 and various other county roads. It's my impression that the Forestvale alternative would have a greater benefit associated with existing and future residential and commercial development. The Ten-mile Creek corridor in that location would make a great public hiking and biking trail if access to the corridor was enhanced and if negotiations with the land owner could include granting of the corridor as a public hiking-biking trail.

Thank-you for the opportunity to comment.

Sue Hoell
Certified General Real Estate Appraiser
Helena

Response to Comment #7

The Federal Highway Administration and the Montana Department of Transportation thank you for your positive comments on the I-15 Corridor EIS process and your suggestions for other needed improvements in the study area.

After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1 has been identified as the Preferred Alternative in the FEIS for several reasons. These include the proximity of the Custer interchange to city infrastructure and existing growth, fewer environmental impacts, and greater east-west connectivity to growth areas.

Comment #8: CT Canterbury

Comment #8 continued

Studt, Mark

From: C T Canterbury [chick@mt.net]
Sent: Monday, March 10, 2003 10:18 AM
To: mstudt@state.mt.us
Subject: Public Comment: I-15 Corridor EIS

Dear Mr. Studt:

As a citizen and member of the Helena/Lewis and Clark County Planning Board, I am writing to support the Custer Interchange Alternative (Alternative 1) based on the I-15 Corridor EIS as referenced below.

The MDT concluded that the Forestvale interchange wasn't going to accomplish much in terms of traffic management, relative to its cost, and that's why they questioned the location themselves, originally. Also, a Forestvale interchange would put tremendous development pressure on a relatively undeveloped area of agricultural land with known problems due to sheet flooding from Ten Mile Creek and high groundwater. The Forestvale site is also located well beyond existing and future planned infrastructure utilities.

In contrast, a Custer interchange would provide access to and encourage development in an area immediately adjacent to the city and existing growth. It would improve access to and from the southeast Helena Valley transitional growth area that the County has already identified for more growth. It would substantially improve access for recreationists traveling to Hauser and Canyon Ferry reservoirs, particularly for those coming into the valley on I-15 from the north or south. It would also improve access to the Helena National Forest on the east side of the Missouri via York Road and York Bridge and via Canyon Ferry Road and across Canyon Ferry Dam. To me, the broader public benefit, short-term and long-term, is served by building a new interchange at Custer. I think that alternative is also more consistent with the vision for valley growth and development reflected in the growth policy.

Thanks for your consideration. Listed below are applicable citations from the I-15 EIS Study:

"By early 1996 final planning and design activities were underway to support construction of the Forestvale interchange beginning in 1997. However, additional traffic engineering studies that were completed during this same time period raised questions about the overall effectiveness of the new interchange in improving traffic congestion in the North Valley, particularly along N. Montana Avenue and at the Capitol Interchange." (I-15 EIS: 1.3 Corridor Background)

"The Forestvale Road interchange may contribute to a greater cumulative effect of impacts to converted land and ecological resources (including groundwater availability, 100-year floodplain, wetlands, and irrigated hay and grazing land serving as habitat) since it may contribute to more undeveloped land being developed. The Custer Avenue interchange may promote the infill or redevelopment of land already disturbed that is closer to the core urban areas. Additionally, current infrastructure may better support the Custer Avenue and South Helena interchanges, while a Forestvale Road interchange may require more physical and fiscal resources to expand the necessary utility, sanitation, and water systems." (I-15 EIS 5.26.3.1 Land Use (Growth) Impacts)

"If Alternative 1 is selected as the Preferred Alternative, it is possible that any anticipated growth could be located between or adjacent to the proposed Custer and South Helena interchanges. Due to the physical extent of Alternative 1, this alternative could effectively concentrate more future development in and around the areas of existing infrastructure, therefore lessening the burden on surrounding groundwater resources as a sole water source. The alternative is more compatible with the goal of focusing utility growth to the southeastern developing areas (as stated in the Helena Water Supply 2010 Plan), and reservoir improvements (associated with City of Helena FY2000 Phase 1 Water Supply Improvements) that have recently been constructed to accommodate anticipated growth in the southern interchange area. Based on city and county plans, Alternative 1, located in an Urban area, encourages future anticipated development to exemplify more of an "infill" approach as opposed to a "dispersed" approach that could

result from a more northern interchange, such as the Forestvale Road interchange proposed in Alternative 2, located in a Transition Area." (I-15 EIS 5.26.3.2 Water Quality/Resources Impacts)

"Though difficult to assess, it is likely that a positive cumulative impact of Alternative 1 could be that less undisturbed land would be converted to development compared to Alternative 2, due to the fact that there is less natural, open land within the extent of this Alternative, and infill development would be more likely to occur. Collectively, the effects of less land conversion could also result in less new impervious surface area; therefore, reducing runoff and adverse cumulative impacts to surface water resources, and associated aquatic habitat. Although some of the anticipated growth undoubtedly could shift north of the extent of Alternative 1, it is more likely that future growth and development would remain more centralized around the proposed transportation improvements." (I-15 EIS 5.26.3.2 Water Quality/Resources Impacts)

"Though difficult to assess, the aforementioned cumulative impacts associated with Alternative 2 impact future sustainability in the quality and quantity of groundwater to a greater degree than Alternative 1. Northerly growth shifts potentially associated with Alternative 2 could result in "leapfrog" development, or development beyond existing and future planned infrastructure utilities. Development in these areas will rely on wells and septic systems, which could have an increased impact on groundwater. However, some limitations to development north of Forestvale Road occur with the North Hills Temporary Controlled Groundwater Area. In addition, the cumulative impacts of increased impervious surface area in the northern portion of the study area would have more of an adverse impact upon surface water resources such as Tenmile Creek, located near the proposed Forestvale Road intersection. Cumulative impacts resulting from surface water degradation (as summarized above) could affect both aquatic and non-aquatic wildlife and habitat." (I-15 EIS 5.26.3.2 Water Quality/Resources Impacts)

Response to Comment #8

The Federal Highway Administration and the Montana Department of Transportation thank you for your thorough review of the I-15 Corridor DEIS and your thoughtful comments.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS for many reasons, including those you listed.

Comment #9: Mark M. Mackin

Studt, Mark

From: MARK M MACKIN [mamackin@juno.com]
Sent: Tuesday, March 11, 2003 3:16 PM
To: mstudt@state.mt.us
Subject: I-15 corridor study: Draft EIS out

Mark Mackin
4286 Hart Lane, Helena MT 59602
ph: 406-227-5237
"Freedom is not the right to live as we please, but the right to find how
we ought to live in order to fulfill our potential." Ralph Waldo
Emerson

Dear Mr Studt,

I am responding to the I-15 corridor EIS. Please incorporate my comments into the record.

The do nothing alternative is unacceptable. We have obvious traffic bottleneck, safety problems, and East-West access issues that need to be addressed.

I strongly prefer the Custer alternative.

The presentation of the alternatives sets up a false sense of choice in the either/or sense. The real choice is the order in which all or most of these projects will be done. Not doing the Custer improvements is not a realistic option. Not doing Forestvale is a realistic option at the present time.

At first, the Forestvale alternative seems much less expensive on its face. But even though the price tag for Custer is higher, all these higher cost improvements still must be built in the near future. So we won't be able to avoid the expense of the Custer alternative by choosing the Forestvale alternative. We will just avoid addressing those issues while they become more difficult and expensive as that area develops.

In effect, going with Forestvale means doing Forestvale, and Custer, and all the other projects poorly because state and local resources will be spread out among them. Going with Forestvale at this time means spreading development piecemeal all over the valley and having inadequate infrastructure everywhere.

Going with Custer means concentrating public resources where the need is most urgent and growing. Forestvale can be delayed without causing serious problems, but Custer cannot.

The Custer alternative serves the designated development area chosen by the county in its recent land use planning review and growth policy. This is the area we have agreed to develop intensively and ought to develop; and that is where public resources should be concentrated. There is public acceptance for development in the Custer area. Development in the Forestvale area at this time may repeat the earlier hostilities, and further delay much needed improvements.

The total costs of either alternative are beyond the immediate budget for the district. This means an incremental, one project every couple years, approach in any event. Current commercial development in the Custer and Montana and Washington Avenue vicinity and the traffic it draws must be accommodated by the improvements outlined in the Custer alternative. Even

Comment #9 continued

though it seems pricey, it will be less expensive to do it now instead of later.

Sincerely,

Mark Mackin
4286 Hart Lane, Helena MT 59602
ph: 406-227-5237

Response to Comment #9

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

The considerations in prioritizing corridor improvements are discussed in Section 2.11 of the Final EIS. Final decisions will be made by MDT and the Montana Transportation Commission following the Record of Decision.

Comment #10: Kathleen D. Gerl

March 11, 2003

I would like to preface my comments with an observation: it was a tactical coup to package the South Hills Exchange with Alternative 1 and 2. In doing so it eliminated the discussion about the merits of the South Helena Exchange in relationship to the Custer Street and the Forestvale Exchanges. In my opinion the Custer and Forestvale exchanges would address real, longstanding needs whereas the South Helena Exchange addresses a want (the city would like to add to its tax base) and a possible need (emergency services) which is already being addressed by the modifications to the Capitol exchange.

More to the point, in building the South Hills exchange the influx of traffic into the residential South Hills and Broadway area streets will result in a degradation of the neighborhoods. Of specific concern to me is the fact that students of Smith School, most of whom live south of Broadway, and the students at the First Lutheran school will now have to cross two major interstate arteries (Broadway and Winne) when they walk to school.

My husband and I chose to live within the city limits because we wanted our children to be able to walk to school. We preferred the convenience of city life, despite the cost of city services, to country life and the commuting it necessitates. Unfortunately, those neighborhood streets, which we helped pay for, are now being viewed as thoroughfares for out-of-city and out-of-county residents who want a quicker commute to work and to the hospital. The resulting degradation to our neighborhood would be easier to accept if all it meant was a loss in property value. What I refuse to accept is the loss of neighborhood identity and safety whereby our grandchildren, who also live on Red Letter Street, will not be able to safely walk to school.

Several unsuccessful attempts have been made to secure neighborhood approval to put in sidewalks along California. Those students living between California and Montana Avenue also have no sidewalks to use in walking to school. As a result children ride or bike in the street. I no longer see the sidewalk and the bike path issues as simply neighborhood issues. Since the South Hills exchange is being put in to accommodate the life style of commuters from the Helena Valley and Montana City, Lewis and Clark and Jefferson counties, I feel that those users should be required to help pay for these SID's out of respect for our city neighborhood life style.

While attending the Draft Environmental Impact Meeting at the Colonial on March 11, I was informed that while the DEIS acknowledges the problems created by the new exchange it is the responsibility of city officials to remediate them. I will be glad to be a part of city efforts to create a safe walkway for neighborhood children; however, I feel that if the DEIS were to specifically mention the problems created to **Smith School** and to the **First Lutheran Church school**, our efforts would meet with more immediate success.

Being more global, I would have to say that neither the South Hills exchange, the Capitol Exchange improvements, nor the Forestvale Exchange would be of positive benefit to either my husband or to me in our travel to and from work. With the increased traffic in our residential neighborhoods, I would expect that it will take longer. The Custer Street exchange, however, would be of benefit for traveling to work and to shopping. I would like to think that with all the money that will be spent on I-15 that there will be some benefit for the current citizens of Helena.

*Kathleen D. Gerl
700 Red Letter St.
Helena, Mt 59601*

Response to Comment #10

The Federal Highway Administration and the Montana Department of Transportation thank you for your comments on the I-15 Corridor Draft EIS. The South Helena interchange was included in both build alternatives because it was identified as an essential part of the overall corridor improvements needed to address existing and future problems in the corridor. Chapter 2.0 of the Draft and Final EIS describes the process followed to reach this conclusion.

The DEIS compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway. Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. These studies indicate that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also indicate that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the growing employment base in the hospital area.

The new interchange at Custer Avenue is included in Alternative 1 which has been identified as the Preferred Alternative.

Comment #11: Don & Nadine Copley

Response to Comment #11



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

We feel we must comment on the I-15 Corridor Draft EIS.

As former residents on Broadway, for many years, we still have a special interest on how the traffic impact will affect that street and its residents. Whatever decisions are made, there will be some increase. However, in the final analysis, a plan could be implemented to "share" the traffic increase impact.

We are now living in Coventry Court on Belt View. The entire Helena Eastside will be affected somewhat, but it leads us good. We fully realize the importance of this project for now and future traffic patterns leading into our growing community.

Your consideration of the Broadway link will be greatly appreciated by not only Broadway residents but also residents connecting Broadway. Thank you!

Name: <i>Don & Nadine Copley</i>	
Address: <i>416 Coventry Ct - Helena</i>	
Phone: <i>442-9400</i>	e-mail:

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

C:\My Documents\CorridorStudy\Comment\Comment.doc

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The DEIS compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway.

Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. These studies indicate that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also indicate that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the growing employment base in the hospital area.

Comment #12: Constance M. Cole

Comment #12 continued

March 12, 2003

Mr. Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Ave.
Helena, MT 59601

RE: Comments on I-15 DEIS

Dear Mr. Studt:

The statement of purpose and need outlines the safety and capacity improvements in the project section of Interstate 15. The need for improvements reflect that increases in population and changes in land use patterns in the Helena valley have increased traffic volumes on Interstate 15, on the interchanges and ramps serving I-15, and on the east-west highways crossing over or under the interstate. Increased traffic has decreased the operating efficiency of the interstate, the interchanges and east-west roadways. The accident rate for the corridor is above average, particularly in the vicinity of the existing interchanges when traffic entering the Interstate has to merge with oncoming, faster through traffic. I-15 has also become a barrier to non-motorized east-west travel and a limit to motorized travel.

None of the concerns listed above would be addressed by construction of the Forestvale Interchange. The proposed location would not provide increased linkages for east-west traffic, connecting only traffic between North Montana Ave. on the west and the Frontage Road on the east. The Forestvale Interchange would not respond to the desire for increased opportunities for non-motorized travel. While an Interchange in this location would physically convey pedestrians across the interstate it would provide few residents with an opportunity to walk or ride their bikes to work.

Construction of an interchange at Forestvale would not provide additional capacity for travelers to access the Missouri River corridor or national forest lands east of Helena and the many recreational sites associated with these resources. The number of resident and nonresident recreational days associated with fishing and boating opportunities on the river and its associated reservoirs continues to rise. An interchange at this location would add no additional capacity to reach recreational sites on National Forest lands in the Big Belts or Elkhorns. A Forestvale Interchange would be of little service to travelers approaching Helena from the north or south to reach Lakeside, York or Townsend recreational sites.

Construction of an interchange at Forestvale would have numerous adverse environmental and human consequences. The riparian areas along the 10 Mile stream corridor provide high quality seasonal habitat for a number of terrestrial and avian wildlife species, including such watchable wildlife as whitetail deer, hawks, coyote, and fox. The former borrow site south of the Little Red Schoolhouse and areas adjacent to the 10 Mile watershed provide important seasonal wetland resources. Construction of an interchange in this location would adversely impact existing wildlife habitat, including the use of agricultural lands. Locating a high volume interstate interchange immediately adjacent to an elementary school would increase noise levels and the potential for vehicle/pedestrian collision.

Construction of a Forestvale Interchange will do little to improve capacity for existing traffic volumes and little to accommodate anticipated future increases. It would offer little improvement of east-west traffic crossing the interstate, particularly for non-motorized and recreational uses.

For the reasons stated above I request that construction of an interchange at Forestvale is not chosen as the Preferred Alternative. Thank you for the opportunity to comment and for consideration of my concerns.

Sincerely,

Constance M. Cole
6040 Ferry Dr.
Helena, MT 59602

Response to Comment #12

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor project and your thorough discussion of the Forestvale interchange location.

Alternative 1, which includes a new interchange at Custer Avenue, has been identified as the Preferred Alternative in the FEIS for many reasons, including those you listed.

Comment #13: Ms. Stevens

Studt, Mark

From: Peil, Carl
Sent: Wednesday, March 12, 2003 8:32 AM
To: Studt, Mark; Johnson, Mick
Subject: I-15 Corridor EIS

I received a call this morning from a Ms. Stevens (Sp?) of Helena regarding the I 15 EIS. She was unable to attend the hearing last night and want to add her input. Her input was that the major problem in Helena is the railroad crossing on North Montana Avenue and that an underpass should be built there first before any decision is made on locations of new interchanges on the Interstate. Logic was that traffic patterns are adversely affected due to anticipation of the railroad crossing being blocked. I explained briefly our funding sources and the coordination process that exists with the State, County and City over priorities of projects.

Carl S. Peil
Preconstruction Engineer
444-6242
CPeill@state.mt.us

Response to Comment #13

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Improvements along N. Montana Avenue were given serious consideration early in the process but were determined to be outside the purpose and need for this project. This issue is discussed in Chapter 2.0 of the DEIS and the FEIS.

Comment #14: Karen D. Burk

Response to Comment #14

03/12/2003 10:22 4064425917

J&K BURK

PAGE 01

ATTN:
MARK STUDD

3-12-03

COMMENT SHEET

I am writing regarding my concerns about the I-15 Corridor plans.

I agree Custer would be a good place for an interchange. I can not speak about the Forestvale interchange because I rarely am in that area.

I feel plans should be started on the Capitol interchange now. It is not safe and I think the plans the groups involved have come up with are good and I thank you all.

I do not agree with the Montana City frontage road plan at all. I live on Broadway and for years we have tried to work with planners to keep more traffic away from our homes. The cars from Montana City using the frontage road would use Broadway to the Capitol or Downtown. No other street in our area was even suggested.

Today, I can hardly get out of my driveway. Cars going east or west will not give an inch to allow me to enter the flow. I know that is not your fault but more traffic is not acceptable.

One of the ladies that spoke at the Colonial meeting 3-11-03 suggested the frontage road be on the east side of I-15. I would go along with this thought. The Montana City traffic could use the suggested loop that would take traffic to Colonial Drive or Lamborn if they are going to the Capitol or Downtown and not come down Broadway.

Please consider her idea. This area has just started to develop. You could be in the plans and protect the home owners!

PLEASE HELP US ON BROADWAY WITH THE TRAFFIC!

Karen D. Burk
2001 Broadway
Helena MT 59601
406 442-6904

Karen D Burk

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Improvements to the Capitol interchange are included in Alternative 1 which has been identified as the Preferred Alternative.

The DEIS compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway.

Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. These studies indicate that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also indicate that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the growing employment base in the hospital area.

Comment #15: Alan Gilda

March 24, 2003

Dear Mark Studt

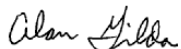
Thank you for keeping us posted on the progress of the I-15 study. I can see from the numerous newspaper articles that there is going to be a lot of politics to deal with and wade through. It is also very evident that the "big money people", the developers, and those who think they can make millions on the deal will be weighing in very heavily. Unfortunately I am one of the majority of nobodies, the majority of those in this area that don't have anything to gain financially by either of the alternatives. Yes, one or the other will make our life easier, the other could make it harder...but that is what you are commissioned to find out and then choose the overall best that would benefit the most.

After reading the articles in the paper and talking to a few of my neighbors, I would like to weigh in with my support for Alternative 1 - the Custer Ave. interchange. As much as I would like to see an interchange at Forestvale, I have to say that an interchange at Custer makes a lot more sense than one at Forestvale. The most evident reason to support a Custer interchange is that it will serve a lot more people than just the small area around Forestvale. The Custer interchange will not only serve us in the Valley, but also the large group of people who come from York and North East Helena.

The one negative comment on the Custer interchange is that the on and off ramps need some more work, especially dealing with the frontage road north. I would like to ask you to try to figure out a way so that it flows more naturally and so that there won't need to be 3 or 4 lights in a ½ mile distance. Idea, relocate the road in front of the airport so it comes out where the north frontage road does. But, it had better be done or noted before the developers start their building projects there.

In closing, I want to say that I support the Custer Ave. interchange because it will service a lot more people and it is much more practical at this point and into the future than the Forestvale interchange. Also, once Montana Ave. is widened out and the City of Helena hires a competent person who knows how to time lights for traffic flow and not traffic congestion and pollution, a lot of our Montana Ave. issues will immediately go away.

Thank you,



Alan Gilda, Mining Engineer
1365 Van Orsdel Rd.
Helena, Mt. 59602

Response to Comment #15

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

The current plan would result in five signals in the one mile between N. Montana Avenue and Washington Street, with signals at those two locations plus proposed Sanders Street, I-15 west side ramps, and I-15 east side ramps. Widening of Custer will also be incorporated with the interchange in order to provide appropriate turn lanes at intersections. The amount of signals is normal in an urban condition, and will operate well when combined with the proper roadway laneage and turn lanes.

Comment #16: Jack Kendley

MAR. 26. 2003 8:11AM HLNA RANGER DISTRICT

NO. 330 P. 1
3/26/2003

I do support Alternative 1 of the MDT
environmental analysis of the I-15 corridor
I feel growth should be concentrated and
located adjacent to existing utilities
Thanks for the opportunity to comment -
call if you have questions.

Jack Kendley
2005 Hansen Blvd
Helena, MT
59601

442-5706.

Response to Comment #16

The Federal Highway Administration and the Montana Department of Transportation would like to thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

Comment #17: Gregg Wheeler

Halouska, Troy K.

From: Wheeler Family [westernwheelers@msn.com]
Sent: Wednesday, March 26, 2003 9:24 PM
To: Halouska, Troy K.
Subject: Comments on Helena I-15 Draft EIS

Troy,

After reviewing some of the analysis of the I-15 final Draft Environmental Impact Statement, I favor Alternative 1 for the following reasons:

- Concentrating growth around the new Custer interchange, rather than at Forestvale Road, would be more cost effective for taxpayers in terms of providing the additional services required by new development.
- The environmental impacts would be less. The Forestvale interchange would result in loss of farmland, as well as increased runoff and groundwater contamination in the valley.
- More directly addresses some of Helena's traffic issues, because the Custer interchange would get greater use than a Forestvale interchange.

The Custer interchange appears to be the alternative that will best serve the needs of the Helena community through responsible growth management and transportation efficiency.

Sincerely,
Gregg Wheeler
1716 Highland St.
Helena, MT 59601

Response to Comment #17

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS for many reasons, including those you listed.

Comment #18: Cedron Jones

Comment #18 continued

March 26, 2003

Dear MDT:

Below are my comments on the I-15 Corridor DEIS.

1. The amount of money available for NHS and Interstate maintenance seems out-of-proportion to the need - we'll end up with a more-than-adequate Interstate Highway, while the rest of the system limps along, barely meeting our needs. I wish the Transportation Commission would utilize some of the funding flexibility that the federal legislation allows, so that more money could be invested in the various streets that cross I-15, where the real needs are.

2. Safety issues are virtually ignored in this DEIS - probably because you realize the safety concerns are not on I-15 but on the cross streets, and your rigid policies don't permit investing enough in the cross streets.

The only crash statistics presented are for I-15 itself, and you make the point that the crash rate (1.52) is 31% above the state average. However, if you had bothered to ask you could have learned that the crash rate for I-15 through Great Falls is 1.44 (Airport to Vaughn); so even with the horrible ramps at northbound Capitol Interchange, and the "functionally obsolete" bridges over the RR tracks and other problems, our crash rate is just 6% more than the comparable rate for Great Falls. That suggests we can anticipate very minor safety benefits from investments in I-15 itself.

In comparison, the crash rates for the various streets crossing I-15 are significantly higher:

Hwy 12/11th-Prospect couplet:	11.57
Cedar St	9.53
Custer Ave	11.76
Lincoln Road	6.37

(These figures, from MDT, are for the segments from Montana to east of I-15.)

So in terms of safety, fixing the Capitol and Custer crossings is a clear priority over improving the already quite safe interstate.

3. The basic premise behind your alternatives is flawed. That premise is that the various proposed improvements work best in combination with one-another; and therefore one should study (and model) various combinations of projects. The problem is that, as you acknowledge on p.5-62, construction of either alternative will be 'staged' due to funding considerations; so it will likely be many years between each major project (new or reconstructed interchange). Thus, the question is not just which projects to do, but also what order to do them in. And your DEIS provides absolutely no information to guide that sequencing issue - though we will clearly have to live many years with the impacts of a partially built alternative.

You should supplement the Final EIS with analysis that helps guide the decisions about what order to do the projects in - for whichever alternative is chosen. I note also that the Advisory Committee requested detailed analysis for each proposed major improvement (p.20).

4. Table 2-5 seems to imply that CTEP is the only source of funds for the ped-bike components of the alternatives. That is not true and should be corrected. And the ped-bike components of all of the I-15 projects should be financed with the NHS and Bridge funds.

5. Your discussion of "induced demand" on p.4-7 is badly off-the-mark. The issue is that a transportation improvement (like a new interchange) can induce land-use changes (like new development at that interchange) that in turn induces vehicle trips beyond what would have been expected based on existing development. Other sections of the DEIS appear to recognize this, but I wonder if your traffic modeling did and does.

6. For example, on p.3-19 you state that only 15% of the projected use of a South Helena interchange would be attributable to "induced demand." That seems counter-intuitive for several reasons. First, there's virtually nothing there (no trip generators or destinations) and likely won't be until & unless an interchange is built. There are no roads at all on the east side, to carry vehicles originating to the south up to that interchange. And your models predict little or no increase in west-side frontage road traffic with construction of that interchange. So where does that remaining 85% of the use come from?

7. Table 4-5 gives a "best" rating to both build alternatives for ped-bikes and trucks. But clearly a Custer Interchange is much better than a Forestvale Interchange for both user groups, because Custer accesses so many more important destinations. And just replacing the Custer bridge (Alt. 2) is not nearly as effective as re-doing the entire segment, from Montana to Washington.

8. Figures 3-12 & 4-1 (same figure) show the ADT on Custer just west of I-15 wrong (it's more like 25,000 than 14,000).

9. The discussion about land-use impacts on pp.5-98,99 is mostly good; I agree with that assessment overall.

10. But the statement on p.5-2 (5.2.1) about new households locating near I-15 "because of its importance for north-south access in the Helena Valley" is ridiculous, since with no new interchange there would be no way to get on it.

11. Regarding the Broadway underpass project, that underpass should be built large enough to accommodate ambulances, in case the Capitol Interchange is blocked in an emergency.

12. Regarding the Boulder underpass project, that project should not have been dropped since it directly meets the 'purpose and need' of "facilitating the movement of east-west traffic crossing the interstate." It would be a low-cost way to improve mobility for peds & bikes (with a paved path within the MDT right-of-way on the east side of I-15 between Boulder and Billings) and to improve neighborhood access to the Walmart area, thereby relieving congestion at the Capitol Interchange.

Comment #18 continued

13. I favor smaller projects that can be quickly designed and built, in stages, rather than 3 or 4 'mega' projects. So my priorities would be

(a) top priority (to address the safety concerns at Custer & at Capitol (by providing quick & easy alternative routes)):

1. redo the north bound ramps at Capitol as proposed
2. complete a paved frontage road from Montana City to Colonial Dr.
3. pave road and provide ped-bike path at Boulder
4. align east frontage road with Washington at Custer
5. redo the bridge over I-15 at Custer (safety, ped-bike access, emergency vehicle access).

(b) 2nd priority

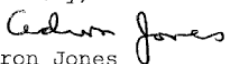
5. underpass at Broadway - big enough for ambulances
6. north-side ramps at Custer (south-bound exit, north-bound entrance)
7. direct ramp from Colonial to south-bound I-15

(c) 3rd priority

8. new I-15 bridges over RR tracks
9. south side ramps at Custer
10. south Helena interchange

14. Perhaps the worst decision this DEIS made was to drop TDM from detailed analysis & consideration. If the highways establishment were run with any consideration of economic efficiency, TDM would have been your top project. The worst problems associated with the I-15 corridor (poor LOS during the AM & PM commute at Capitol interchange area) are largely attributable to state and hospital-area employees. What might be possible if you took just 10% of the projected cost for 'fixing' that Interchange and applied it to TDM projects with those employers? I don't think anyone disputes the wisdom, and especially the economic efficiency, of having the energy utilities fund energy-conservation projects at homes and businesses, to reduce demand and defer or eliminate the need for expensive new generation. You should quit just dismissing TDM and actually invest some thought and resources in it; and the LOS problems on the I-15 corridor are an excellent place to start.

Sincerely,


Cedron Jones
940 Wilder
Helena, MT 59601

Response to Comment #18

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Since you raised so many issues we will number our responses to match your comments:

1. The amount of money available for the NHS and Interstate maintenance programs is a function of a national distribution formula prescribed by federal legislation. The Transportation Commission allocates these funds throughout the state in a manner that best meets identified needs. The alternatives presented in the Draft EIS will actually direct a considerable percentage of the overall project costs to improving the cross streets which connect to the new or improved interchanges.
2. The safety data evaluated for this project was researched and reviewed to determine if there were any particular locations that have unique or substandard design characteristics that contribute to crashes. The results of the crash data revealed no unexpected concentrations of crashes, given some of the known design deficiencies along the interstate and on the crossroads. The higher crash rates on cross roads are expected since they include intersections and more conflict points than a freeway. The generally high rates are likely due to the substandard designs and the level of traffic congestion, particularly on Capitol and Custer. Since each alternative includes substantial upgrades at interchanges, adjacent sections of associated crossroads will be reconstructed to modern design criteria (such as shoulders, sidewalks, good intersection sight distance, etc.), which provides the most direct method of addressing safety issues.

Response to Comment #18 (continued)

3. The combination of various transportation improvements reflects and addresses both the broad purpose and need for this project and the desires of the community expressed in over 3,200 comments received. The Draft EIS includes analysis of each of the transportation improvements as isolated projects and in combination. No significant environmental impacts were identified and, therefore, your concern about living with consequences of partially built alternatives appears to be unfounded. Project sequencing decisions will be made as appropriate funding becomes available for use on the corridor.
4. Table 2-5 is intended to indicate the major sources of funding available for corridor improvements and examples of how those funds can be utilized. MDT will appropriate available funding in ways that maximize the accrued benefits of the project.
5. The traffic model and any other comparisons included in the DEIS compare the 2025 No-Action to 2025 build alternatives. The basic premise behind the 2025 forecasting is that the population of the Helena region will be about 81,250 in 2025, regardless of which alternative might be selected. The assumption is that a road improvement will not change the overall population in the region, but the road improvements will influence where the population or associated jobs might be located within the region. Given the uncertainties inherent with forecasting 22 years into the future, this is considered a valid assumption based on what we know today and available planning forecasts. Therefore, the traffic model assumes the same number of vehicle trips in the region, regardless of alternative. [Please also see response to Comment #3 (EPA) for additional discussion.]
6. As mentioned above, the 2025 No-Action Alternative assumes that the Helena region continues to grow into the future, and the local Land Use Advisory Group forecasted that the area south of US 12

Response to Comment #18 (continued)

- near the South Helena interchange would still receive a portion of that growth, even in a No-Action scenario. The “other 85%” is the growth that would occur even with a No-Action scenario. The Land Use Advisory Group forecasted growth in that area not just based on roadways but on available infrastructure (water, sewer, power, etc.) and also the commitment of the local governments to focus growth in this area. The sensitivity analysis was done on the South Helena-only interchange scenario, which determined that this area might be about 15% larger in 2025 if South Helena was the only interchange developed.
7. We have received a number of comments indicating advantages for bicyclists and pedestrians with Alternative 1. More direct access to commercial properties with Alternative 1 also appears to be advantageous for trucks but other concerns have been raised about negative impacts of additional truck traffic on Custer. Table 4-5 has been modified to indicate separate ratings for bike/ped and trucks.
 8. The traffic volumes were obtained from the City of Helena and reflect 2001 counts on the section of Custer over I-15. The traffic volume closer to N. Montana Avenue may be higher due to the location of business accesses just east of N. Montana Avenue. The figures have not been changed.
 9. Thank you for your positive comments concerning the land use discussion.
 10. The nine-member Land Use Advisory Group felt that this was the appropriate distribution of new households for the reason stated. No change in the text is required.
 11. The reconstruction of the Capitol interchange will include an eight-lane bridge plus sidewalks/bike paths on each side of US 12, so it is unlikely that the Capitol interchange could be completely

Response to Comment #18 (continued)

blocked. The Broadway underpass will be built to the same dimensions as similar MDT bike/ped crossings provided in other communities. This may provide enough width for limited emergency access.

12. While an improved Boulder Avenue underpass would facilitate the movement of east-west traffic crossing I-15, it was shown to have very little overall benefit on traffic or safety within the study area. Current traffic volumes on Boulder are very low and will continue to be low following the reconstruction of the Capitol interchange. The reconstruction of the I-15 bridges over the railroad will widen the opening for Boulder Avenue under I-15 which could encourage additional use by bicyclists and pedestrians (see the *Helena Non-Motorized Transportation Plan*). The connections of local roadways to this underpass were explored with the city of Helena but due to numerous complications arising from the adjacent railroad properties, Helena has not moved forward with a concept that would connect the underpass via Railroad Avenue.
13. An important component in determining project phasing is knowing what the ultimate design will be for each of the proposed improvements. For larger and more complex improvements such as the Capitol interchange, phased construction will likely require several years, with some parts of the interchange being open before other parts. Phasing will be determined for each project based on available funding, ability to accommodate traffic during construction, priority needs within the corridor, and many other factors. We appreciate receiving your recommended prioritization.
14. TDM measures were seriously considered and discussed throughout the early stages of this project. Other than a strong desire to improve bicycle and pedestrian facilities throughout the corridor, little interest or support was expressed within the community for alternative modes or TDM measures. Even if TDM

Response to Comment #18 (continued)

applications could be aggressively implemented, it would not be enough to offset the substantial growth in travel demand anticipated in the study area. TDM applications do not address the needs for updating functionally obsolete infrastructure such as deficient shoulders, narrow bridges, and other safety related improvements that are greatly desired by the community. Voluntary TDM applications are an important component of the transportation needs of any community, and they should be incorporated at appropriate levels as determined by the local communities and employers.

Comment #19: Pat Helvey

MARCH 27 '03

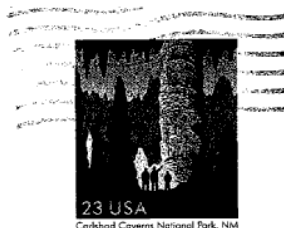
TO WHOM IT MAY CONCERN:

I AM WRITING TO SUPPORT ALTERNATIVE 1
PLACING THE NEW NORTH INTERCHANGE AT
CUSTER AVE. IT SEEMS LOGICAL TO
CONTINUE GROWTH AT THAT END OF
THE VALLEY IN THAT INFRASTRUCTURE
BUSINESS, AIRPORT ETC. ARE THERE.
SEEMS TO ME TO BE A SMART CHOICE -
KEEPING THE ACTIVITY GOING ^{THERE} AND
TRAFFIC SPREAD IN CHECK.

SINCERELY



PAT HELVEY
PO BOX 4904
HELENA MT 59604



1-15 CORRIDOR STUDY
PMB 150
2905 N MONTANA AVE
HELENA MT 59601



Response to Comment #19

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

Comment #20: Robert & Hope Stevens

Little Falcon Farm

HOPE B. (HOPIE) STEVENS • ROBERT T. (BOB) STEVENS, JR.

P.O. Box 1510, Helena, Montana 59624
Phone 406-442-9424

3/28/03

Montana Dept of Transportation

Subject: I-15 Draft EIS

Sirs: We favor Alternative 1

New North Helena Interchange at Custer Avenue

The worst thing that could happen is to put an Interchange at Forestvale because it does not relate to existing major arteries. Custer does relate - and very well.

The complaints of the Fire & Rescue as per Forestvale is a function of their ~~pre~~^{decision} to build at Forestvale before the project was finally approved. All is not lost because there are fairly good alternatives

Regards

Robert J. Stevens

Hope B. Stevens

Response to Comment #20

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

Comment #21: Russell E. Wrigg

March 28, 2003

Mr. Mark Studt
Montana Department of Transportation
2701 Prospect Ave.
Helena, Mt. 59620

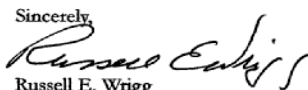
RE: I 15 Corridor Draft EIS

Dear Mr. Studt:

I am writing today to provide my comments on the I 15 corridor DEIS. I am in support of Alternative #1 because it best provides solutions to today's needs. I do however have some concerns about the selection of project priorities within that Alternative and the location or even the need for the South Interchange. Following please find my concerns and/or suggestions:

- The Capital Interchange reconstruction should be designated as the highest priority project within Alternative #1. The recommended improvements will solve the Helena areas most recognized traffic problem, both from logistic and safety standpoints. Included in the Capital Interchange project should be the improvements to the Montana City Interchange and the completion of the Westside Frontage Road from Montana City to Colonial Drive. These improvements will go a long ways to solve the current and the short-term future south access problems.
- The proposed Custer Interchange should be designated as priority #2. Construction on this project should be scheduled to begin immediately after the completion of the Capital Interchange project.
- The South Interchange option should be designated as priority #3. Construction of this project should be delayed until after the completion of both higher priority projects. This interchange location was selected because of its proximity with undeveloped land on both the east and west sides of the Interstate. The reasoning behind the selection was that the new interchange access would encourage development in that area. That certainly would be the case, but should taxpayer dollars be used on a project primarily for future development or should they be spent on more sorely needed projects. Delaying this project 5-10 years (time needed complete Capital and Custer) will certainly help identify the real need and location for an additional south I 15 interchange. Remember that from the connection point to Colonial Drive to the Montana City Interchange is about 3 miles. The completion of the proposed frontage road is a higher priority than the proposed interchange.

Thank-you in advance for consideration of my comments and views.

Sincerely,

Russell E. Wrigg
36 South Davis
Helena, Mt. 59601

Response to Comment #21

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

An important component in determining project phasing is knowing what the ultimate design will be for each of the proposed improvements. For larger and more complex improvements such as the Capitol interchange, phased construction will likely require several years, with some parts of the interchange being open before other parts. Phasing will be determined for each project based on available funding, ability to accommodate traffic during construction, priority needs within the corridor, and many other factors. We appreciate receiving your recommended prioritization.

The purpose and need for the South Helena interchange is to provide another southern access south of the Capitol interchange. To consider long-range planning and transportation needs, the Land Use Advisory Group provided input where future employment and growth would likely occur (see Final EIS Volume 1, Section 1.9.1). The fact that development would probably occur in the South Helena location has been presented as a secondary or cumulative impact, which was carefully analyzed and described in the Draft and Final EIS.

Comment #22: W. H. Walters, P.E.

W. H. Walters, P.E.

40 Microwave Hill Road
Clancy, MT 59634

Telephone: 443-3329

March 29, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, MT 59601

The following are my comments on the I-15 Helena Access – Corridor study.

Helena is, has and will continue to have growing pains with a tremendous need for business and home expansion room.

The land east and west of I-15 between the Capitol and Montana City interchanges is almost perfect for development. This land should be classified as dry (usually very dry) grazing land, not prime farm land with no ground water problems like the valley.

In my opinion, the highest and best use for this land is business and residential development (which Helena sorely needs). The recent city water tank and water line improvements definitely promotes development.

The main impediment to this beneficial development is lack of vehicle access and the barrier created by I-15.

In fact, the existing development is significantly starved by very poor vehicle access. Presently traffic is squeezed through the choke points at Prospect, Fee and Eleventh which is significantly overloaded and over capacity. To alleviate this access problem, both present and future, I recommend Alternative No. 1.

From personal experience as a retired MDT Area Engineer, I realize the actual construction and traffic congestion relief from Alternate No. 1 will be a long, long time coming. Design, right-of-way, utility moves and funding will take many years – possibly 10 to 15.

The existing traffic congestion begs for immediate relief. I recommend the following temporary solution which are cheap and could be constructed quickly this summer, possibly with maintenance resources.

1. Add a parallel lane with southbound I-15 off-ramp at Broadway. This would significantly relieve traffic congestion at the southbound Capitol interchange off-ramp and Fee Street traffic lights. Very little or no new right-of-way required.

Comment #22 continued

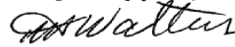
Mark Studt, P.E.
March 29, 2003
Page 2

2. For the westbound traffic on Prospect, use pin down curb and delineators to eliminate the third (right) lane from the structure to the I-15 southbound off-ramp. This would increase the intersection capacity and reduce ramp traffic backup by allowing a continuous free right turn onto the protected lane.
3. Finish grading the north mile of the west frontage road to Broadway and provide milled asphalt surface. A lot of traffic now uses this frontage road even though it is muddy, rough and incomplete. Each car that uses this frontage road reduces traffic congestion at the Capitol interchange.
4. Add a southbound I-15 on-ramp at Broadway to reduce traffic volumes at the Eleventh and Fee signal. No new right-of-way probably would be needed.

In summary, I strongly favor Alternate No. 1 and recommend serious consideration of the immediate safety enhancements and congestion-relieving construction recommendations 1 through 4.

If you need further clarification of these recommendations, I would be glad to help.

Respectfully yours,


W. H. Walters, P.E.
3085 PE

Response to Comment #22

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

The completion of the EIS defines the ultimate solutions at the new and reconstructed access points with I-15. As final design begins, MDT can consider numerous construction phasing and detour options including those mentioned in your letter.

Comment #23: Tim Wunderwald

Halouska, Troy K.

From: Wunderwald [timnles@in-tch.com]
Sent: Saturday, March 29, 2003 4:02 PM
To: Halouska, Troy K.
Subject: INTERSTATE 15 CORRIDOR COMMENTS

I would like to take this opportunity to comment on the I-15 Helena area study.

As a public servant for the past ten years, (Firefighter/E.M.T West Helena Valley Volunteer Fire Department), I strongly support the proposal for an interchange at the Forestvale location. Many of us who live east of the Interstate must drive an additional 2-3 miles in order to respond to emergency calls. This response time could be dramatically reduced if there was an adequate way to access the middle portion of the West Valley from the east side of the Interstate. On the same note, West Valley Volunteer firefighters are often forced to travel 5 or more miles further than would be necessary to access Interstate emergencies. Considering that West Valley Fire recently built a new station at the location of Montana Ave. and Forestvale under the notion that an interchange was likely, the response time could have been and still could be significantly shortened by having a central access to the Interstate. Currently, traffic is forced to use Sierra Road to cross the Interstate, which creates a safety issue at Rossiter Elementary School. Finally, as a resident of the Central West Valley area, I as well as many others, need to access the Interstate and would appreciate not having to fight the city traffic to do so.

I believe that the safety of the Central West Valley far outweighs the so-called commercial demand, which the city claims is the reason for the other alternative, Custer Avenue Interchange. If there is truly a need for an interchange at Custer then surely the commercial sector will come up with a way to ensure that consumers have access to their establishments. Furthermore, considering that the Forestvale property was already purchased for the purpose of constructing this interchange, this option would be the most economical one.

Although I believe that the decision is purely about politics and economics, which eliminates Forestvale as an option, I hope you will still consider the opinion of the underdog.

Thanks,

Tim Wunderwald

Response to Comment #23

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

The issue of emergency service needs and response times was one of the issues that drew a great deal of attention in developing alternatives. Section 4.5 and Figures 4-8 through 4-11 are devoted to this topic in both the Draft and the Final EIS. In the final analysis, both Alternatives 1 and 2 showed an overall improvement in system-wide emergency response times of approximately six percent when compared to the No-Action Alternative. Alternative 1, which includes the new interchange at Custer, has been identified as the Preferred Alternative for many reasons. These reasons are fully described in Chapter 2.0 of the FEIS.

Comment #24: David Boggs

Halouska, Troy K.

From: David Boggs [dabogman@attbi.com]
Sent: Sunday, March 30, 2003 12:27 PM
To: Halouska, Troy K.
Subject: helena I-15 draft

In regard to the draft EIS for Helena I-15:

I strongly support the recommendation for a Custer interchange over a Forestvale. A Custer interchange would serve most of the residents of Helena. A Forestvale interchange would only serve a small number of valley residents, lead to urban sprawl, and in the end only benefit a small number of land developers at great public expense.

Response to Comment #24

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

Comment #25: Anonymous

April 1, 2003

1) It seems to me that the MEPA/NEPA process was bent a bit. My comments are not directed to impair the project (for the record I concur with the Custer Ave. interchange option), but where does these advisory committees come from by holding and releasing their "votes" and backing prior to the end of the public involvement process? By their very nature, these committees are very persuasive, after all that's what they are set up for. By the Transportation Coordinating Committee "backing" the Custer Ave. option on March 11 by holding a vote, and the same with the I-15 Advisory Committee on March 12 strongly persuades the public opinion. I get the feeling that some believe that its not worthwhile to submit their comments, because the alternative is already set in stone. This is an EIS, not an EA! By its very nature, does not the preferred alternative make itself largely by completion of the public involvement process? The process of receiving, reviewing and addressing public comment ends April 7, not at the March 11 meeting or a day or so afterwards as these advisory committees seem to think!

2) I back the Custer Ave. Interchange Option with the same reasoning as most have put forth. The infrastructure is there to connect to city services. It's where most of the industrial development has, and seems to be taking shape (Home Depot), and Custer Ave. services one of the few existing major east-west modes of transportation through this valley.

3) However, I strongly believe that ultimately Forestvale needs to be developed sometime in the future. The design and right-of-way is complete. It would nicely accommodate the much-needed bypass. As part of the EIS, it should be recognized that Custer Ave. and Highway 12 alone will not suffice at some point in the future for moving traffic in an efficient manner.

4) My last comment is that how come Custer Ave. and Forestvale are in "options" set up to either favor one or the other, but not both? This leads back to the whole EIS process covered in comment 1) above. Is not the process suppose to identify the preferred treatment(s)? I agree strongly with placing an interchange in the south hills, but I believe the whole valley area needs a lot a work to include more east-west and north-south arterials. This includes both Custer and Forestvale. The way it is set up, I am forced to pick one or the other (Custer vs. Forestvale). This is wrong! By the very nature of the process, this set-up of options strickly forbids choosing the southhills, Custer and Forestvale altogether. They are all needed.

Response to Comment #25

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

An Advisory Committee was developed for this project knowing that the community was divided regarding a transportation solution for the study area. The Committee brought together individuals representing a broad range of interests and backgrounds to provide input to the decision-makers, MDT and FHWA. This input was extremely beneficial in helping focus the development of transportation improvement options on issues of greatest importance to the community at large but did not determine the Preferred Alternative. The Committee's recommendation of Alternative 1 was appropriately received during the 45-day public comment period. Identification of the Preferred Alternative included consideration of recommendations by the AC, the TCC and all public comments received throughout the public comment period. Section 7.8 of the FEIS outlines this process. We have no reason to believe the AC recommendation had any effect in limiting the number of comments received on the DEIS.

After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative. The Forestvale project will not be foreclosed to future consideration if Alternative 1 is ultimately chosen.

As discussed in Sections 2.6.1 and 2.6.2 of the DEIS, consideration was given to including two new interchanges north of Capitol. Our analysis showed that over the 20-year planning horizon, only one interchange is needed.

**Comment #26: David Cole, Lewis & Clark County
Consolidate Planning Board**

Comment #26 continued

April 1, 2003

Mark Studt, P.E.,
Consultant Project Engineer
Montana Department of Transportation
Preconstruction Bureau
2701 Prospect Ave. PO Box 201001
Helena, MT 59620-1001

RE: Helena I -15 Corridor Draft EIS Comments

Dear Mr. Studt:

The bylaws of the City of Helena - Lewis and Clark County Consolidated Planning Board state that "'The Board may, from time to time, comment upon plans and planning-related policies subject to review or adoption by Federal or State agencies, and/or may recommend that the Helena City Commission or the Lewis and Clark County Commission make appropriate comments on the same."

On March 18, 2003 the Helena/Lewis and Clark County Consolidated Planning Board, by a vote of 8-0, passed a motion to support the Custer Interchange Alternative (Alternative 1) as proposed in the I-15 Corridor EIS as referenced below.

The Planning Board was surprised to see very little mention of non-motorized transportation access in the final alternatives. It appears that there was considerable discussion and support for increased emphasis on this issue but no mention in the final draft alternatives.

The Planning Board noted that the MDT had concluded 1997 that the Forestvale interchange wasn't going to accomplish much in terms of traffic management, relative to its cost. Also, a Forestvale interchange would put tremendous development pressure on a relatively undeveloped area of agricultural land with known development constraints due to sheet flooding from Ten Mile Creek and high groundwater. The Forestvale site is also located well beyond existing and planned municipal utilities.

In contrast, a Custer interchange would provide access to and encourage development in an area immediately adjacent to the city and existing growth. It would improve access to and from the southeast Helena Valley transitional growth area that the County has already identified for more growth. It would substantially improve access for recreational travel to Hauser and Canyon Ferry reservoirs, particularly for those coming into the valley on I -15 from the north or south. It would also improve access to the Helena National Forest on the east side of the Missouri via York Road and York Bridge and via Canyon Ferry Road and across Canyon Ferry Dam. It appears that the broader public benefit, short-

term and long-term, is served by building a new interchange at Custer. The Planning Board believes that the Custer alternative is also more consistent with the vision for valley growth and development reflected in the Lewis and Clark County Growth Policy.

For these reasons, the City of Helena - Lewis and Clark County Consolidated Planning Board supports the Custer Interchange Alternative (Alternative 1). We thank for your consideration of our comments.

Listed below are applicable citations from the I-15 EIS Study:

"By early 1996 final planning and design activities were underway to support construction of the Forestvale interchange beginning in 1997. However, additional traffic engineering studies that were completed during this same time period raised questions about the overall effectiveness of the new interchange in improving traffic congestion in the North Valley, particularly along N. Montana Avenue and at the Capitol interchange." (I-15 EIS: 1.3 Corridor Background)

"The Forestvale Road interchange may contribute to a greater cumulative effect of impacts to converted land and ecological resources (including groundwater availability, 100-year floodplain, wetlands, and irrigated hay and grazing land serving as habitat) since it may contribute to more undeveloped land being developed. The Custer Avenue interchange may promote the infill or redevelopment of land already disturbed that is closer to the core urban areas. Additionally, current infrastructure may better support the Custer Avenue and South Helena interchanges, while a Forestvale Road interchange may require more physical and fiscal resources to expand the necessary utility, sanitation, and water systems." (I-15 EIS 5.26.3.1 Land Use (Growth) Impacts)

"If Alternative 1 is selected as the Preferred Alternative, it is possible that any anticipated growth could be located between or adjacent to the proposed Custer and South Helena interchanges. Due to the physical extent of Alternative 1, this alternative could effectively concentrate more future development in and around the areas of existing infrastructure, therefore lessening the burden on surrounding groundwater resources as a sole water source. The alternative is more compatible with the goal of focusing utility growth to the southeastern developing areas (as stated in the Helena Water Supply 2010 Plan), and reservoir improvements (associated with City of Helena FY2000 Phase 1 Water Supply Improvements) that have recently been constructed to accommodate anticipated growth in the southern interchange area. Based on city and county plans, Alternative 1, located in an Urban area, encourages future anticipated development to exemplify more of an "infill" approach as opposed to a "dispersed" approach that could result from a more northern interchange, such as the Forestvale Road interchange proposed in

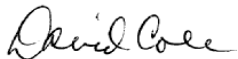
Comment #26 continued

Alternative 2, located in a Transition Area." (I-15 EIS 5.26.3.2 Water Quality/Resources Impacts)

"Though difficult to assess, it is likely that a positive cumulative impact of Alternative 1 could be that less undisturbed land would be converted to development compared to Alternative 2, due to the fact that there is less natural, open land within the extent of this Alternative, and infill development would be more likely to occur. Collectively, the effects of less land conversion could also result in less new impervious surface area; therefore, reducing runoff and adverse cumulative impacts to surface water resources, and associated aquatic habitat. Although some of the anticipated growth undoubtedly could shift north of the extent of Alternative 1, it is more likely that future growth and development would remain more centralized around the proposed transportation improvements." (I-15 EIS 5.26.3.2 Water Quality/Resources Impacts)

"Though difficult to assess, the aforementioned cumulative impacts associated with Alternative 2 impact future sustainability in the quality and quantity of groundwater to a greater degree than Alternative 1. Northerly growth shifts potentially associated with Alternative 2 could result in "leapfrog" development, or development beyond existing and future planned infrastructure utilities. Development in these areas will rely on wells and septic systems, which could have an increased impact on groundwater. However, some limitations to development north of Forestvale Road occur with the North Hills Temporary Controlled Groundwater Area. In addition, the cumulative impacts of increased impervious surface area in the northern portion of the study area would have more of an adverse impact upon surface water resources such as Tenmile Creek, located near the proposed Forestvale Road intersection. Cumulative impacts resulting from surface water degradation (as summarized above) could affect both aquatic and non-aquatic wildlife and habitat." (I-15 EIS 5.26.3.2 Water Quality/Resources Impacts)

Sincerely,



David Cole, Chair
City of Helena - Lewis & Clark County Consolidated Planning Board

Copy: Jim Smith, Mayor
City of Helena

Anita Varone, Chair
County Commission
Lewis & Clark County

Response to Comment #26

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

TDM measures and non-motorized transportation were seriously considered and discussed throughout the early stages of this project. Other than a strong desire to improve bicycle and pedestrian facilities throughout the corridor, little interest or support was expressed within the community for alternative modes or TDM measures. Even if TDM applications could be aggressively implemented, it would not be enough to offset the substantial growth in travel demand anticipated in the study area. TDM applications do not address the needs for updating functionally obsolete infrastructure such as deficient shoulders, narrow bridges, and other safety related improvements that are greatly desired by the community. Voluntary TDM applications are an important component of the transportation needs of any community, and they should be incorporated at appropriate levels as determined by the local communities and employers.

Comment #27: Barry and Frieda Houser

Comment #27 continued

April 2, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, MT 59601

Dear Mr. Studt:

We are submitting this letter to your committee to express our concerns regarding the Draft Environmental Impact Statement (DEIS) for the I-15 Corridor. Our home property is at 4 Pronghorn Drive in Northern Jefferson County (Montana City). The unimproved frontage road currently runs through our property via an access easement put into place before we purchased our home in 1994. Our concerns deal with the proposed improvement of this frontage road as it included in the DEIS.

The DEIS calls for the improvement of the west side Frontage Road on the west side of I-15 from Montana City to Colonial Drive (I-15 DEIS, section 2.8.4.3). This improvement as you well know is proposed as part of both the I-15 recommendations. We have several concerns regarding this improvement:

- The exact location of the frontage road in proximity to where it now runs;
- Reclamation of the land, which is our property, if the road is moved;
- Estimated daily traffic flows and speeds;
- The increased noise and unsightliness this improvement would bring;
- And safety issues pertaining to the increased traffic.


As I mentioned before, the road is now running through our property by means of an access easement. This easement was put into place by the original developer of the Southgate Hills Minor Subdivision, of which my property is included. We purchased the property in 1994 and have been the only owners of the property. At the time of purchase, there was never any mention of the dirt road which runs through the property becoming a high-speed, high-traffic frontage road. I was unable to ascertain from the DEIS the exact location of the proposed improved Frontage Road. Will it remain in its current location, or will it be moved further east, closer to the interstate? I have been told by different sources that each scenario exists, so I would like someone of authority to clear this situation. We personally would prefer the road to be moved closer to I-15 in the event this proposal is approved. If the road is moved out past the boundary of our property, then the second of our concerns comes into play, and that is reclamation of land that now contains an access easement. Our primary concern would be the possible trespassing of our property by others who would continue to drive over the existing dirt road if the improved Frontage Road were moved closer to the interstate. We are sure most people would be appreciative enough to remain off our property, but there is always the possibility of those who would be intrigued by driving over the old dirt road. How would the State and/or Department of Transportation handle this situation and help us with the reclamation?


Another item I was unable to find in the DEIS was the proposed daily traffic flows for this particular stretch of Frontage Road. A couple of years ago, I spoke with Jason Giard of the Department of Transportation, and he was guessing traffic may be anywhere between 4,000 to 10,000 vehicles daily. We find this to be an astronomical figure, however, if it is correct, there is no argument that our lives will be greatly affected by this improvement. As it is now, I would be surprised if more than a few hundred vehicles travel down this road daily. It would be greatly appreciated if someone could give us an educated estimate on the future traffic flow of the proposed Frontage Road. With this kind of increased traffic, it is only natural that we are concerned with the increased noise and unsightliness this proposal will bring. In section 5.25.3 of the DEIS, you state that noise would not be impacted by the improvement of the west side Frontage Road. How is that possible? Do you not believe an increase from a few hundred vehicles daily to possibly several thousand will not drastically increase noise? Not a single person involved with the I-15 corridor study has contacted the residences in our subdivision to ask them about increased noise, its impacts, or how to minimize the effects. Has the construction of a noise barrier been considered? I know personally, since we have learned of the possibility of the road being improved into a Frontage Road, we have been busy planting trees, building fences, etc. on our property facing the road in hopes of creating some kind of barrier. Unfortunately, we have limited resources and time in which to complete anything that may be adequate. We would like to see some discussion on this issue.

Last, but definitely least, on our list of concerns is safety. The majority of property running north from Northern Jefferson County into Lewis & Clark County is currently zoned residential. This is highlighted in Figure 3.1 of the DEIS. This includes Southgate Hills Minor Subdivision (of which we are part of) and the recently approved Pronghorn Hills Major Subdivision. Our subdivision already has families with younger children, mine included, and I'm sure as Pronghorn Hills grows, it too will be comprised of people raising families. As this is to be a Frontage Road, what kind of safety issues will the proposal address? Will there be reduced speed limits along this stretch of road, as you see in residential areas throughout towns? Will there be full shoulders and guard rails? Currently, there is a four-way stop as the road meets Highway 282 and South Hills Road. Will that remain in place? Will there ever be any enforcement or patrols on the road, and if so, in what jurisdiction does it fall? These issues need to be addressed and thought out as well.

As it stands now, we are opposed to the improvement of the west side Frontage Road as it pertains to the I-15 corridor. However, we would be willing to support the project if it is done properly and is done with the current residents in mind. I have included with this letter, information off the Federal Highway Administration's website concerning highway traffic noise and possible solutions. We would appreciate it if someone involved in the project would contact us, maybe even come out to our property, and go over these issues with us. Thank you for giving us the opportunity to voice our concerns.

Sincerely,


Barry Houser
4 Pronghorn Drive
Clancy, MT 59634
(406)442-6898


Frieda Houser
4 Pronghorn Drive
Clancy, MT 59634
(406)442-6898

Response to Comment #27

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Jefferson and Lewis & Clark Counties have worked jointly with MDT to establish an alignment and right-of-way for the west side Frontage Road that is directly adjacent to the I-15 right-of-way, except at the far north end where it would reconnect to Colonial Drive. The realigned roadway is nearly completed as a county-standard gravel road, so the supporting element as mentioned in the DEIS is to pave the roadway to accommodate the traffic demand anticipated. It is believed that the right-of-way agreements have already been made along the entire alignment, and the reclamation of land should be explored through the counties. At the South Helena interchange, the Frontage Road would re-align west about 750 feet to allow adequate distance between the Frontage Road intersection and the intersections for the ramps. MDT will conduct additional analysis of property impacts during final design to see if potential impacts of the re-alignment of the Frontage Road can be reduced.

The 2025 traffic forecasts on the Frontage Road are not substantial when compared to the 2025 volumes on I-15, with Frontage Road volumes ranging from 3,000 to 6,000 vehicles per day, and over 30,000 vpd on I-15. Speed limits on the Frontage Road will be set by the cities and counties and will be based on city/county standards and the number of intersections and property accesses. The noise levels on I-15 will far exceed noise levels generated by a Frontage Road based on traffic volume, speeds, and number of trucks. Since the noise levels with the build alternatives are almost exactly the same as the No-Action, and

Response to Comment #27 (continued)

since no freeway widening is considered in this area, noise mitigation is not required as part of the project. Since most of the homes in the South Hills area are elevated above I-15, it would be very difficult to provide effective noise mitigation.

Comment #28: Ed & Marilyn Bartlett

Ed & Marilyn Bartlett
2012 E. Broadway
Helena, MT 59601

April 2, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, MT 59601

RE: Interstate 15 Corridor, Montana City to Lincoln Road, EIS

Dear Mr. Studt:

We have reviewed the draft Environmental Impact Statement (EIS) for the Interstate 15 Corridor Alternatives and are very concerned that the EIS fails to address Broadway neighborhood traffic mitigation. The Capitol Interchange changes and the South Interchange addition, especially the west Frontage Road and Colonial Drive improvements, will result in significant increase of traffic on Broadway Street. This is the case whether or not there is a vehicle underpass or interchange at Broadway and I-15.

We support the Capitol Interchange changes, but only with traffic mitigation to defer, control and minimize traffic on Broadway west of California Street. The Broadway area is a quiet, well-maintained residential neighborhood and neither Broadway nor other streets in the neighborhood are designed to handle commuter traffic from I-15.

Our concern over increased traffic on Broadway arises from the failure of the EIS to address mitigation while recognizing that traffic volumes will increase on "segments of Broadway". It also seems logical that your predicted traffic volume increase of 20% to 50% at the Capitol Interchange, with predicted volume decreases on Montana Avenue near the State Capitol, will result in traffic increase on Broadway west of California.

Please ensure that traffic mitigation measures are implemented on Broadway before the Capitol Interchange, west Frontage Road and Colonial Drive changes are completed.

Sincerely,

Ed Bartlett
Marilyn Bartlett

Ed & Marilyn Bartlett

c:\documents and settings\bartlett\my documents\I-15 eis comments.doc (Ed Bartlett)

Response to Comment #28

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Our studies compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future, regardless of any improvements to I-15, to provide a substantial employment base at the east end of Broadway.

Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. This analysis indicates that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also indicate that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the growing employment base in the hospital area.

Our studies, which very carefully considered potential impacts to residential neighborhoods throughout the study area, do not indicate any significant changes in traffic volumes along Broadway resulting from the I-15 Corridor improvements described in the DEIS. Accordingly, we do not believe that traffic mitigation measures are required along Broadway Street to offset impacts associated with our project.

Comment #29: Pete Brustkern

Pete & Kari Brustkern
2 Pronghorn
Clancy, MT 59634

April 3, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Avenue (59601-9746)
P.O. Box 201001 (59620-1001)
Helena, Montana
E-mail: mstudt@state.mt.us

Dear Mark:

This letter is to express my opinion on the proposed changes to the Interstate 15 Corridor. I believe the transportation concerns listed in the DEIS can be addressed through the proposed improvements to the existing interchanges, and possible addition of a Forestdale or Custer interchange. The need for the frontage road could also be eliminated with the South Helena Interchange. Most of the families who moved into North Jefferson County did so to have more space and less congestion. The completion of the frontage road through the area currently zoned as residential property will increase the congestion and cause hazards for the residents.

If the frontage road is completed, I would propose a reduced speed limit (35 MPH) near the South Hills and Pronghorn Hills residential developments. These neighborhoods are primarily single family dwellings and are home to numerous small children. My family and I chose the South Hills area before the study and proposed changes and my primary interest is my family's safety.

Sincerely,

Pete Brustkern

Response to Comment #29

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Studies of existing and future traffic volumes completed for the Draft EIS clearly indicate that additional improvements are needed throughout the I-15 corridor. Simply improving the existing interchanges or adding one new interchange in the North Valley will not adequately address the purpose and need for the project.

Jefferson and Lewis & Clark Counties have worked jointly with MDT to establish an alignment and right-of-way for the west side Frontage Road that is directly adjacent to the I-15 right-of-way, except at the far north end where it would reconnect to Colonial Drive. The realigned roadway is nearly completed as a county-standard gravel road, so the supporting element as mentioned in the DEIS is to pave the roadway to accommodate the traffic demand anticipated. Speed limits on the Frontage Road will be set by the cities and counties and will be based on city/county standards and the number of intersections and property accesses.

Comment #30: Willie R. Taylor, USDO I

Comment #30 continued



ER-03/159

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240



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FHWA
MONTANA DIVISION

Mr. Dale W. Paulson
Program Development Engineer
Federal Highway Administration
2880 Skyway Drive
Helena, Montana 59602

Dear Mr. Paulson:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for I-15 improvements between Montana City and Lincoln Road in Jefferson and Lewis and Clark Counties, Montana. The Department of the Interior (Department) has reviewed the document and submits the following comments regarding our thoughts on this project.

Comments on the Draft EIS

The Department recognizes and appreciates the extent of public and agency participation initiated by the Federal Highway Administration (FHWA) and Montana Department of Transportation, including the various Federal, State, and local agencies and the general public. We are pleased that most of these agencies including the Montana Historical Society (SHPO) concur with your findings. We are concerned, however, that the document does not describe coordination with affected Native American tribes. Any affiliated Native American groups should be contacted to verify whether ethnographic resources exist in the project area; and the results of that coordination should be included in the document.

The third paragraph on page 3-93, *Section 3.17 Cultural Resources* states that 18 sites are in the area of potential effect, six of which are listed on, eligible, or potentially eligible for the National Register of Historic Places (NRHP). The last sentence, however, states that the remaining eleven sites are not NRHP-eligible. These numbers do not add up to the total of 18 sites. Please clarify the discrepancy.

Comments on the Draft Section 4(f) Evaluation

The range of alternatives and avoidance alternatives provided in the document shows that all possible planning was conducted to minimize harm to Section 4(f) properties. We recognize that this initial planning effort has resulted in the total avoidance of some Section 4(f) properties and minimized harm to others. Once a Preferred Alternative has been selected, we will determine our concurrence regarding whether there are any feasible or prudent alternatives to the Preferred Alternative.

We are concerned that archaeological site locations have been disclosed in a public document. Information pertaining to archaeological resource site location should be removed (maps, specific site descriptions) to protect intact archaeological deposits from potential damage or looting. We would also like to remind you that archaeological sites typically qualify as Section 4(f) properties when they need to be preserved in place (i.e., are NRHP-eligible for reasons other than data potential). In this case, if sites 24JF697 and 24JF1719 are NRHP-eligible under criterion D and do not need to be preserved in place, then they may not qualify as Section 4(f) properties.

We appreciate the opportunity to provide these comments.

Sincerely,

for Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

Response to Comment #30



US Department
Of Transportation
Federal Highway
Administration

Montana Division
2880 Skyway Drive
Helena, Montana 59602

August 13, 2003

Dr. Willie R. Taylor, Director
Office of Environmental Policy and Compliance
US Department of the Interior
Washington, DC 20240

Subject: I-15 Corridor EIS (Montana City to Lincoln Road)

Dear Dr. Taylor:

We greatly appreciate the timely receipt of your written comments on the Interstate 15 Corridor (Montana City to Lincoln Road) Draft Environmental Impact Statement (EIS). Your comments have directly contributed to improving the accuracy and quality of the final documentation for this important transportation improvement project.

At your suggestion, we have initiated contact with the two Native American groups that could potentially have interest in the I-15 Corridor project. The Helena Valley was not the aboriginal territory of any one tribe and is not associated with territorial boundaries of any tribe currently residing in Montana. However, we have contacted the Confederated Salish and Kootenai Tribal Preservation Office and the Blackfeet Tribe Culture Committee to see if either has interests or concerns regarding this project. Copies of all correspondence will be included in the Final EIS.

As noted in your comments, there was an inconsistency in the text of Section 3.17 concerning the number of cultural resource sites within the area of potential effect. This has been corrected.

We have also removed archaeological site locations from the figures in Chapters 3.0 and 6.0 of the FEIS and reduced the level of detail provided in the narrative description of these sites. Since none of the archaeological sites will be affected by the project, the information provided in the Draft EIS is not of critical importance in supporting the Preferred Alternative decision.

In our evaluation of archaeological resources, we indicated in the Draft EIS that none of the proposed project improvements would use property from or otherwise affect these resources. Nothing has occurred as a result of comments received on the DEIS or our own refinement of the Preferred Alternative that changes this assessment of impacts. Therefore, there will not be a direct or constructive use of any archaeological site. Accordingly, we do not believe the question of preservation in place needs to be addressed in the Final EIS.

If you have any questions or further comments, please call Carl James, FHWA Transportation Specialist, at (406) 449-5302 ext. 238.

Sincerely,

Dale W. Paulson
Program Development Engineer

cc: Mark Strudt – MDT Consultant Design
Tom Martin – MDT Consultant Design

File: NH 15-4(65)196 cj/lr

Comment #31: Herbert & Margaret George

Herbert and Margaret George
2000 Broadway Street
Helena, Montana 59601

April 3, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, Montana 59601

Re: Interstate 15 Corridor EIS, Montana City to Lincoln Road

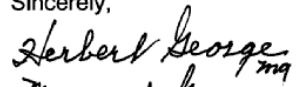
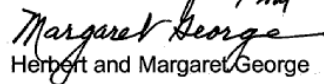
Dear Mr. Studt:

After reviewing the draft Environmental Impact Statement for the Interstate 15 Corridor, we are concerned that it does not discuss traffic mitigation measures on Broadway Street. The Environmental Impact Statement indicates that Broadway traffic did not need study because no Broadway interchange or underpass is included in the alternatives. However, the improvements to the west Frontage Road and Colonial Drive will funnel traffic from the Capitol and South Interchanges onto Broadway Street. Therefore, traffic impacts and mitigation measures on Broadway need to be addressed.

We built our home on Broadway over 30 years ago. This neighborhood is a lovely place to live. It is a quiet and beautiful residential area. None of the streets in this neighborhood, including Broadway, were intended or constructed to be used for commuter and commercial traffic from the Interstate.

It appears that improvements to the Capitol Interchange are needed. However, if the Capitol Interchange improvements and the South Interchange addition are constructed, traffic mitigation to minimize traffic volume increases on Broadway must also be adopted and included at the same time.

Sincerely,



Herbert and Margaret George

Response to Comment #31

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The DEIS compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway.

Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. These studies indicate that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also indicate that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the growing employment base in the hospital area.

Our studies, which very carefully considered potential impacts to residential neighborhoods throughout the study area, do not indicate any significant changes in traffic volumes along Broadway resulting from the I-15 Corridor improvements described in the DEIS. Accordingly, we do not believe that traffic mitigation measures are required along Broadway Street to offset impacts associated with our project.

Comment #32: Jon & Kathie Dilliard

**JON & KATHIE DILLIARD
1659 KARMEN ROAD
HELENA, MONTANA 59602-7310
Telephone: (406) 449-2374**

April 3, 2003

Mark Studt, P.E.
Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, Montana 59601

Subject: Interstate 15 Corridor DEIS

Dear Mr. Studt:

First we would like to commend the Montana Department of Transportation and its contractors in preparing a comprehensive and accurate draft environmental impact statement. After reviewing the document we believe there is very little substantive information that can be added to improve it. As homeowners in the Pleasant Valley Subdivision, an interchange at Forestvale Road would be extremely convenient by providing us with quicker access to both the interstate and North Montana Avenue. However, there is no doubt in our minds that an interchange at Custer Avenue is the best option at this time. Not only has the Custer and North Montana Avenue area become the commercial core for the north side of Helena, but also it is the fastest growing area in town. Additionally, Custer Avenue is the handiest access route to the recreational areas east of town for the citizens of Helena. With readily available infrastructure and services from the City of Helena, it is logical to encourage continued growth in that area as opposed to promoting hopscotch development across the valley floor.

As daily users of the Frontage Road going north of Custer Avenue we would like to point out an additional advantage to the proposed development plan for a Custer Avenue interchange. As the traffic on Custer Avenue increases, it is becoming more and more difficult to turn left and for that matter right on Custer from the Frontage Road. With traffic approaching the intersection at 45 to 50 mph and the increased amount of vehicles using Custer Avenue, the wait for assured clearance to pull out is becoming longer and longer. We can testify to times that the wait to make a left turn from Frontage onto Custer Avenue has been closer to five minutes than not. We have also personally witnessed close calls between school buses exiting Frontage onto Custer and oncoming traffic. It is becoming a matter of split second timing and sufficient horsepower to merge with the traffic on Custer Avenue from Frontage. So the plan to realign Frontage

Comment #32 continued

Mark Studt, P.E.
April 3, 2003
Page 2 of 2

Road to join Custer at the traffic light on Washington Street is clearly a huge benefit for the users of Frontage as well as improved safety for all people using the intersection.

In closing, we encourage the Montana Department of Transportation and the Federal Highway Administration to give Alternative 1 strong consideration as the preferred alternative for this proposed project. Forestvale can wait until the city infrastructure and services catch up to the development in that area.

Thank you for the opportunity to comment on this project. If you have any questions, please do not hesitate to contact us at the address or telephone number at the beginning of this letter.

Sincerely,



Jon Dilliard & Kathie Dilliard

Response to Comment #32

The Federal Highway Administration and the Montana Department of Transportation thank you for your positive comments on the I-15 Corridor EIS process and your suggestions for other needed improvements in the study area.

After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1 has been identified as the Preferred Alternative in the FEIS for several reasons. These include the proximity of the Custer interchange to city infrastructure and existing growth, fewer environmental impacts, and greater east-west connectivity to growth areas.

Comment #33: Marga Lincoln

Comment #33 continued

Marga Lincoln
220 Adams
Helena, MT 59601
(406)457-1443
<hofflinc@ixi.net>

Mark Studt
Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, Montana 59601-9746
<mstudt@state.mt.us>

April 4, 2003

Dear Mr. Studt:

First of all, I want to thank you and MDT for putting together such a good public participation process. It was a pleasure to work with Carter & Burgess. They have been very professional. The DEIS is very thorough, and it's well written. All the public meetings and the advisory committee meetings have been very well run. Work with the media to get out word to the public has been excellent. And the quality of the information in the DEIS is, for the most part, very well researched and presented. I would also like to compliment the Carter & Burgess team for being good listeners and responding promptly with additional information. The process treated citizens with respect.

This letter is my formal comment on the DEIS for Interstate I-15. I am writing both as a citizen and as a member of the I-15 Citizen Advisory Committee.

I support Alternative 1 (new South interchange, new Custer interchange, improvements on existing interchanges, Broadway underpass for ped/bike, widen Cedar Street, and complete Frontage Rd. from Montana City to Colonial Drive).

My reasons are as follows:

The I-15 advisory committee spent several months at the beginning of the EIS process setting up 8 goals for the project and criteria for how we would judge that these goals were met. The goals addressed such topics as minimizing the barrier effect of I-15, providing a transportation system for all modes of travel, minimizing environmental and neighborhood impacts, complying with existing planning documents, etc.). **Upon review of the DEIS, it is clear that Alternative 1 scores much higher on meeting these goals than does Alternative 2 or No Action.**

I hope that the final decision by MDT and the Federal Highway Administration respects the consensus decision by the Advisory Committee to select Alternative 1.

Our 19-member committee devoted many hours to establishing these goals and the objective criteria for measuring them—and then later evaluating the alternatives in terms of these criteria. Our purpose was to move away from emotional reactions and opinions and to find common ground based on objective information.

Alternative 1 would build new interchanges near existing growth and where infrastructure has already been built to accommodate growth. It reduces vehicle miles traveled and travel times. It best serves biking, walking, transit, car pool/van pool options by making connections to existing centers of work and shopping. As a result, there will be greater connectivity for all modes of transportation.

Reasons I oppose Alternative 2 are:

- 1) It flunks all 8 goals.
- 2) It would put an interchange in a rural area that does not have adequate infrastructure; this would exacerbate the problem with contaminated wells in the area. It would put a greater burden on local taxpayers to provide such basic infrastructure as building Forestvale Rd. to connect it with the interstate. Alternative 2 will promote leapfrog development and is contrary to the recommendations in the community's growth policy.
- 3) Choosing Alternative 2 would clearly negate the DEIS consensus process that the community has been using to make this difficult decision.

There are some additional considerations I would like addressed in the final EIS. In addition to the major components listed in Alternative 1, I would like funding allocated to do a pilot Transportation Demand Management program in the Helena area (see discussion on p. 4-41). Helena has a unique opportunity, I believe, to make TDM programs successful and effectively remove traffic congestion from the I-15 corridor. Nearly 12,000 employees are going to 16 job sites. The state is the major employer and already has an organization, Try Another Way State Employees, to encourage employees to try alternative modes of travel to work. Unfortunately, neither that organization nor the local Transportation Choices Committee in Helena have had any funding or staff to implement a TDM program. It is very short-sighted public policy to spend millions of dollars to expand highway capacity and spend no money in developing effective programs to reduce congestion.

I am a strong proponent of multi-modal transportation, which is at the heart of TEA-21 legislation. "Federal transportation policy is to increase nonmotorized transportation to at least 15 percent of all trips and to simultaneously reduce the number of nonmotorized users killed or injured in traffic crashes by at least 10 percent," according to the FHWA. Since the I-15 project will be using TEA-21 funding, it should reflect this federal policy.

See <<http://www.fhwa.dot.gov/environment/bikeped/bp-guid.htm>>
("FHWA Guidance Bicycle and Pedestrian Provisions of Federal Transportation Legislation.").

Comment #33 continued

There is a great deal of public support from citizens on the I-15 corridor for using improved bicycle, pedestrian and transit facilities. (See I-15 public opinion survey—indicating 65 percent would do more walking, 59 percent would do more biking, and 58 percent would use the bus if there were improvements in facilities/services.) I would like to see these multi-modal projects funded from a variety of sources, not just Montana's CTEP funds, which are already over tapped.

Since it is not realistic that we will have the funding to do all of Alternative 1, I think it would be helpful to have some additional modeling information regarding the staging of projects. It would give us a better idea about which projects would provide the most significant improvements for the corridor's congestion and safety. It would be logical to use this criteria for deciding on what interchanges to begin with.

Please **correct or improve** the following sections in the final EIS:

1. There are errors in the I-15 DEIS, Table 2-5, Preliminary Assumption of Funding Availability, p. 2-57& 2-58. It fails to list the many federal funding opportunities for bike/ped facilities. (see the FHWA website listed above)
2. The discussion of "induced demand" on page 4-7 is inadequate. There is a substantial body of research on this topic. (I will be happy to provide more references, but here are a few to start with.

<http://www.trainweb.org/mts/links-induced.html>

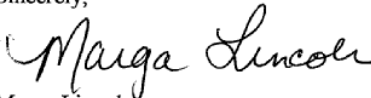
http://www.worldbank.org/html/fpd/transport/roads/rpl_docs/apbinduc.pdf

<http://www.roads.dft.gov.uk/roadnetwork/heta/resresult/capacity/pdf/traffic.pdf>

3. Correct Table 4-5. Alternative 2 does not deserve a "best" rating for bike/ped. The Forestvale interchange would not connect with anywhere that bicyclists and pedestrians want to go. Clearly a Custer Avenue interchange better connects with shopping, work and recreation sites.
4. The document index is so general as to be useless. For instance, see the Land Use listing. You'd spend a half hour going through all the page numbers trying to locate what you are looking for. (I know, I tried.)
5. Correct Table 1-1. Alternative 2 is NOT compatible with the county growth policy. Infrastructure is not planned for another 20 years in the Forestvale area. A multi-million dollar sewage plant is needed first. There are wells contaminated by septic systems out there.
6. Add to the list of planning document references -- the Draft Nonmotorized Plan for the Helena Area that is in progress. It will be completed by the time the final EIS is done.

7. Add a list of the area's top employers and number of employees in chapter 3 (near discussion on page 3-58).
8. There are references to "rural crash statistics," but it is not clear if Helena is considered a rural area or an urban area. Some federal programs consider all of Montana rural.
9. Correct the groundwater discussion on p. 5-34, 5-35. There is pollution of wells from septic systems in the Forestvale area. Based on information from the county commission, there is no practical way for new development in that area to hook up to the city's sewer.
10. There was not adequate discussion of a Broadway Underpass, coupled with neighborhood traffic calming, before it was removed as an option. Would there be any benefit of having the underpass be an emergency vehicle access?

Sincerely,


Marga Lincoln

P.S. I e-mailed you a draft of this yesterday, but have since added some additional information about induced travel demand.

Response to Comment #33

The Federal Highway Administration and Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS. Your comments and suggested edits are greatly appreciated.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

TDM opportunities will exist in the future; however, it is unlikely that TDM alone could offset the substantial growth in traffic demand that will occur in the future. TDM was not included as a supporting element with the build alternatives primarily because these measures would have done very little to address the existing and projected needs in the study area and they received minimal support relative to other proposed improvements.

Response to Comment #33 (continued)

Voluntary TDM applications are an important component of the transportation needs of any community, and they should be incorporated at appropriate levels as determined by the local communities and employers. TDM measures are recommended for consideration as part of all future local and regional planning efforts.

We have addressed your specific numbered comments as follows:

1. In section 2.11 funding from TEA-21 for pedestrian/bicycle improvements was added, including reference to the web site. Please see the second full paragraph under this section of the FEIS.
2. Discussion on induced demand (Section 4.3.1 of FEIS) has been expanded based on the web sites you recommended to include a more detailed definition.
3. In Table 4-5 changed pedestrian/bicycle rating for Alternative 2 to "acceptable."
4. The index has been redone to be more useful.
5. The area around Forestvale is designated a Transition Area (D) in the *Lewis & Clark County Comprehensive Draft Plan* (2000) as well as in their new draft growth policy plan. See the discussion in Section 3.2.2.2 and see Figure 3-3 for more details.
6. The *Draft Non-Motorized Transportation Plan* was added to Table 1-1.
7. Section 3.8.1 of the DEIS and FEIS already lists (alphabetically) the top 10 employers in both Lewis & Clark County and Jefferson County. The number of employees was not available to us. No changes made.

Response to Comment #33 (continued)

8. The statistics cited classify all of Montana as rural.
9. Your comment is consistent with Section 5.4.10 of the FEIS. Some minor clarification has been made to the text. Please see Section 5.5.3.2 for a more detailed discussion.
10. The expansion of the Capitol interchange should greatly improve emergency access in the hospital area. The underpass at Broadway will be sufficient for bicyclists and pedestrians which is consistent with similar improvements provided in other Montana communities.

Phasing of the various improvements has not been determined at this time and will be based on funding priorities and coordination with the Montana Transportation Commission. See Section 2.11 (Volume 1) of the FEIS for additional discussion.

Comment #34: Dick Thweatt, Plan Helena

Comment #34 continued

PLAN HELENA

April 5, 2003

I-15 Corridor Study, PMB 150
2905 N. Montana Avenue
Helena MT 59601
[also transmitted via email to: halouskatk@c-b.com]

The location of new interchanges on I-15 will more profoundly affect how greater Helena and the valley develop and what type of community we become than any plan, any policy or any public official. We hope that MDT will respect the consensus favoring Alternative 1 arrived at by the MDT advisory committee and the local Transportation Coordinating Committee. We believe that the DEIS makes it clear that Alternative 1 is much more consistent with the Lewis & County Growth Policy than Alternative 2. But as far as what will be built when, the DEIS leaves both the public and MDT in the dark as to the impacts of various alternatives for phasing of the various improvements.

One can't help but wonder whether improving I-15 is really that high a priority in the big picture of local transportation needs over the next 20 years. The roads crossing I-15 all have much higher crash rates now than I-15 itself. And what about fixing North Montana Avenue and the railroad grade separation and malfunction junction? The push to improve I-15 seems driven by the availability of big pots of federal money for that facility, not a rational priority of our community's transportation needs. We request that MDT and the Montana Transportation Commission allow greater flexibility for funding improvement of local secondary highways in urban areas that most need improvement.

For that matter, how about some effective transportation demand management in our community? With a large percentage of Helena's workers employed by only a handful of big employers (e.g., the state, Blue Cross/Blue Shield, St. Peters Hospital) there is real potential for an effective program to encourage other ways to get there and back than the single occupancy vehicle. For example, measures such as alternative work schedules to reduce peak traffic volumes and incentive/disincentive programs (e.g., charging employees for parking) could save taxpayers millions in transportation infrastructure. MDT could take the lead in TDM for state employees, but is moving in the opposite direction in abandoning its van pool instead of expanding it as proposed by Try Another Way State Employees. The single occupant vehicle is a very costly addiction in a great many ways.

As Plan Helena's representative on the advisory committee formed by the Montana Department of Transportation (MDT), I spent several days pouring over the draft environmental impact statement (DEIS) on proposed improvements to Helena's I-15 corridor. The DEIS confirmed my opinion that a new interchange at Forestvale Road is not in the best interests of the community for reasons of both transportation efficiency and responsible growth management.

A substantial minority of MDT's I-15 advisory committee still favored an interchange at Forestvale at its final meeting on Wednesday, March 12. But by the end of that meeting, the Forestvale proponents agreed to go along with a consensus in favor of an interchange at Custer subject to two provisos: (1) that issues with emergency response time in the west valley should be addressed; and (2) that MDT should retain ownership of the right of way for an interchange at Forestvale Road.

Here are some of the reasons why Alternative 1 (a new north Helena interchange at Custer Avenue) is the best choice. (Information gleaned from the DEIS has page references; others are my own observations and opinions.)

Better East-West Connectivity

- Alternative 1 (new north interchange at Custer) would do the most to improve east-west connectivity and reduce the barrier effect of I-15. On the east, an interchange at Custer would enhance east-west connectivity between the airport area, U.S. Forest Service, Air National Guard Center, and other employment centers in the airport area, soccer fields, tennis barn and areas served by York Road and Canyon Ferry Road. On the west, an interchange at Custer

would improve access to the Montana/Custer commercial district, Capital High School, the fairgrounds, Benton Avenue, and Green Meadow Road. (DEIS Page 4-32, 33, 34, Sec. 4.6) An interchange at Custer would also connect many more destinations for pedestrians and bicyclists than an interchange at Forestvale.

- To the west, an interchange at Forestvale would lead to a low-density residential neighborhood and to Green Meadow Drive. Forestvale Road would need major improvement to handle the increased traffic.
- On the east, an interchange at Forestvale would go nowhere, only to the eastside frontage road with no existing plans for other connecting roads. An interchange at Forestvale would add an additional crossing of I-15, but only a short distance south of an existing crossing at Sierra Road. It would really not improve east-west connectivity at all.

More Efficient

- An interchange at Custer would reduce traffic on Cedar interchange 20% to alleviate congestion there better than the 10% reduction resulting from an interchange at Forestvale, but either location would maintain an adequate level of service at the Cedar interchange through year 2025. (P. 4-23)
- For emergency response, an interchange at Custer would improve system-wide travel time 4%, same as an interchange at Forestvale. (P. 4-29 - 31: Figures 4-9, 10, 11)
- An interchange at Custer would provide truck access to large retail stores in Custer/Montana district, "a major access location for trucks." An interchange at Forestvale would not increase through truck route options or improve access to major trucking destinations. (P. 4-38)
- An interchange at Custer would be used 1.7 times more than one at Forestvale. Approximately 44,000 daily vehicle trips are projected to use the new Custer Interchange in 2025 as compared to 26,000 daily for Forestvale. (P. 4-14: S4.3.3.2)
- Greater reductions of both total vehicle miles traveled (VMT) and total vehicle hours traveled (VHT) reflect greater system-wide efficiency for an interchange at Custer. An interchange at Custer would reduce total VMT 0.1% more than an interchange at Forestvale as compared to the No Action Alternative in 2025. An interchange at Custer would reduce total VHT 0.3% more than an interchange at Forestvale as compared to the No Action alternative in 2025. An interchange at Forestvale would reduce VMT and VHT on arterial and collector roads slightly more than an interchange at Custer, but this reduction is offset by a larger increase in VMT and VHT on the highway. Small percentage changes in VMT and VHT are considered meaningful. (P. 4-16: Table 4-1; p. 4-18: Table 4-2)

Smarter growth management

- A new Custer interchange would attract development to an area adjacent to city limits that could efficiently be served by city water, sewer, firefighters, police and a dense network of connecting streets.
- Custer would serve an existing and expanding commercial district adjacent to the urban area and promote infill development. Extension of urban infrastructure in this area could happen soon.
- The Lewis & Clark County Growth Policy identifies the area north of Custer as Area C, an urban development area. "An area north of Helena (within one mile, roughly between I-15 and Green Meadow Drive) was identified as an Urban Development Area due to the present development and annexation trends. This area has few environmental constraints, and is within City of Helena planned service areas for water supply and wastewater treatment." (Growth Policy Review Draft 1/15/03, Vol. I, p. II-15)
- Shifting development further north to the Forestvale area is a bad idea. The Forestvale area is not ready for the type of development that would be attracted by an interchange. What roads there are in the area, especially Forestvale Road, are extremely inadequate and would require a large investment of taxpayer money to benefit relatively few local residents and real estate entrepreneurs.

Plan Helena
April 5, 2003

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Comment #34 continued

- The Forestvale area is beyond the 20 year planning horizon for a public water or sewer. Disposal of waste water on site would be problematic and costly due to shallow groundwater and flooding. As the DEIS says "Additionally, current infrastructure may better support the Custer Avenue and South Helena interchanges, while a Forestvale Road interchange may require more physical and fiscal resources to expand the necessary utility, sanitation, and water systems." (P. 5-100, Sec. 5.26.3.1)
- The Lewis & Clark County growth policy identifies the area near Forestvale Road as Area D, the West Valley. It states "The designation of this West Valley as a Transitional Development Area recognizes the existing development pattern and anticipates the need for upgrading and extension of infrastructure to accommodate additional infill development. Planning will need to address the following issues: traffic congestion and safety concerns, incorporation of multiple modes of transportation, opportunities of existing infrastructure, and its efficient extension, efficient land utilization, environmental constraints of flood plains, protection of water quality, and creation of mixed-use neighborhoods." (Growth Policy Review draft 1/15/03, Vol. I, p. II-17) As County Commissioner Murray confirmed at the March 12 meeting, this planning has yet to be done.
- With an interchange at Forestvale, "Commercial and economic development may occur in areas designated as Transition Areas for future infrastructure expansion, thus requiring the expenditure of funds not programmed or anticipated at the present." (P.5-18)
- Custer would promote development on the edge of the existing urban area, promote infill development, induce future community facilities and businesses to locate in the central and southern portion of the study area. (P. 5-10) This would help maintain a more compact, cohesive urban area that is more efficient for transportation, water, sewer, natural gas, and other utilities, more efficient for police and fire protection, more efficient for schools. A more compact community greatly facilitates alternate modes of transportation, such as bicycles, walking and public transit, and these modes can reduce driving and the need for more costly transportation infrastructure. This greater efficiency means lower taxes and better local government services.

Less environmental damage

- The DEIS says it well: "By directing growth to communities where people already live and work, the number of new paved and other impervious surfaces that cover the landscape can be limited, making existing communities more attractive, and discouraging new infrastructure that alters natural hydrologic functions and increases taxpayer burdens. Smart growth strategies generally entail integrating planning and incentives with infrastructure investments to revitalize existing communities, prevent leapfrogging sprawl, provide more transportation choices, and protect open space." (P. 5-105, 5.26.4)
- The area near Forestvale is highly susceptible to liquefaction in the event of an earthquake. (P. 5-7)
- An interchange would directly impact 23 acres of "prime farmland" and indirectly impact much more such land by development induced by the interchange. (P. 5-8)
- Development in this area could increase runoff from impervious sources and pollute surface waters such as Tenmile Creek and adversely affect aquatic life. (P. 5-103, Sec. 5.26.3.2)
- More on-site septic systems could contaminate groundwater and water wells. "Effluent from individual septic systems containing nitrates and pathogenic microorganisms can result in collective adverse health effects over time." (P. 5-102)
- An interchange at Custer would result in cleaner air. An interchange at Forestvale would increase VMT by 15.5% over the No Action Alternative in 2025 compared to 13% for Custer. Increased VMT results in more vehicle emissions and air pollution. In addition, if large commercial developments were to be built near a new Forestvale interchange, even more traffic and air pollution would result from people from town driving out to shop and work in the new stores and offices.
- Impacts from noise would be minimal in the Custer area. A Custer interchange would be in the

Comment #34 continued

airport influence zone and already very noisy. Forestvale would vastly increase traffic along Forestvale Road destroying the relative quiet tranquility of a low density residential neighborhood. The neighborhoods near Forestvale Road would experience "a substantial increase in noise levels greater than 13 dBA." (P. 5-26)

- However, an interchange at Forestvale would shift more traffic off other arterial, collector and local roads and streets and onto to I-15 and may benefit some other neighborhoods. (P. 4-17 & 18)

To sum up (finally!), an interchange at Forestvale would attract large scale development and generate traffic in an area that may be unsuitable for such development and definitely will not be ready for it in the near future. An interchange at Custer will better serve our community in terms of greater transportation efficiency and a more sustainable pattern of development.

Thank you for preparing this new EIS which succeeded in informing the public and our community leaders concerning the problems with an interchange at Forestvale. I think that Carter Burgess did an excellent job of creating and managing the advisory committee. We can only hope that, this time, the consensus achieved by our community will be respected by MDT and the Transportation Commission and that Alternative 1 will be selected.

Very Sincerely,

Dick Thweatt
Dick Thweatt
for Plan Helena

Response to Comment #34

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Many of the issues and concerns raised in your letter are similar to those addressed in Comment #18. Please refer to our Response to Comment #18 for a more complete discussion of these topics. In addition, “smart growth” was looked at in the general context of predicted growth in the area, and the impacts of the various alternatives.

Phasing of the various improvements has not been determined at this time and will be based on funding priorities and coordination with the Montana Transportation Commission. See Section 2.11 of the FEIS for additional discussion.

Again, we thank you for your active participation in the development of the I-15 Corridor EIS and your positive comments on the process followed for the project.

Comment #35: Marla Larson

April 6, 2002

Mark Studt, Project Manager
Montana Department of Transportation
2701 Prospect Avenue
Helena, Montana 59601-9746

Dear Mr. Studt:

I want to thank you and the other staff and officials of MDT, the FHA, the city of Helena and Lewis and Clark County, and the consultant, Carter Burgess, on all the work you have done on the I-15 Corridor study process and public outreach. I know that it has taken a lot of time and effort and you should be pleased at the quality of the study process.

This letter is intended to convey my support for Alternative 1 of the alternatives under consideration. As I understand, Alternative 1 is the new South interchange Custer interchange, improvements to the existing interchanges, Broadway underpass for pedestrian/bike access, etc. Alternative 1 addresses much more clearly Helena and the Helena valley's needs and is more consistent with city and county growth policies intended to minimize the long-term financial and environmental impacts of development. Alternative 2, which I understand includes the proposed Forestvale exchange, is not consistent with city/county growth policies which will help minimize the economic and environmental impacts of growth. Alternative 2 will impose additional tax burdens on the local area to support transportation investment that is not clearly needed, but is clearly environmentally unsound.

Second, I support incorporating pedestrian and bike facilities into the projects to the maximum extent physically possible. Helena and the area of the county adjacent to Helena has some pedestrian and bike facilities, but there are significant gaps in the system. If the opportunity to include pedestrian/bike facilities is taken up in these projects, we will go a long way to filling in these gaps. The surveys that I am aware of, going back to the original implementation of the ISTEA planning process, all show very strong support for pedestrian/bike facilities. On a less scientific level, even our fragmented, less than quality pedestrian/bike system, still seems to get a lot of use. A better system would certainly be used more. On a related note, besides supporting pedestrian/bike infrastructure investment, I want to support continuation and expansion of other transportation demand management policies and programs within Helena and surrounding region to ensure that these investments in roadway infrastructure are not quickly over-run by traffic growth.

I appreciate your time and attention. Thank you for considering these comments.

Sincerely,



Marla Larson
1529 Laurel Street
Helena, MT 59601

Response to Comment #35

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

All improvements under the Preferred Alternative include pedestrian and bicycle facilities. Pedestrian and bicycle facilities were strongly supported during the public involvement process. Local jurisdictions are encouraged to continue with plans for more improvements.

TDM measures are recommended for consideration as part of all future local and regional planning efforts.

Comment #36: Nancy Pitblado

Studt, Mark

From: Nancy Pitblado [npitblado@mt.net]
Sent: Monday, April 07, 2003 12:48 AM
To: mstudt@state.mt.us; gambriillKM@c-b.com
Cc: halouskatk@c-b.com
Subject: Comment on I-15 Corridor Study Alternatives

April 7, 2003 **I-15 Corridor Study, PMB 150**

2701 Prospect Ave. Helena MT 59601

In my capacity as a member of the consolidated Lewis and Clark Planning Board, I would like to express my personal support for **Alternative 1** from the Draft EIS. The Planning Board has submitted comments (in which I concur fully) but I wanted to provide my personal viewpoint as well.

Very likely this decision will affect how greater Helena and the valley develop even more than our growth policy. The Planning Board has recently spent many months revising this policy. Alt. 1 fully supports the old and to-be-revised growth policy, particularly its goals to encourage growth where city services and infrastructure are available, and to preserve our open space and agricultural lands.

In the last year the Board has had many large subdivision requests for the North Valley. There is always a question of lack of infrastructure (roads, schools, water, lack of sewers, etc) and no money to address them. We try to "mitigate" these problems, but in an arid state like Montana, the options are limited and, in my view, unacceptable for the most part.

Two new subdivisions have been proposed near Custer, where city services are available. Also the new Padbury proposal to the east of I-15 has city services nearby. These three proposals will go a long way toward providing room for additional growth in a responsible manner. Alternative 1 is fully supportive of these latter proposals (where infrastructure exists) and Alt. 1 does nothing to encourage more subdivisions in the North Valley. This is extremely important because, as we all know, a new highway interchange (like Forestvale, Alt 2) will stimulate development around it. This would be contrary to the existing and proposed growth plan and to the views of the majority of people that had input to the development of the growth plan (it had extensive public input).

The choice of Custer rather than Forestvale is critical. The various other parts of the alternatives 1 and 2 are excellent and I commend the parties for some creative thinking on solving our many other transportation problems. Improvements in the existing interchanges, a Broadway pedestrian underpass, and provision for a south interchange (critical for the Padbury proposal among other things) are excellent. I am particularly pleased that access to the Hospital will be improved. The public input for this I-15 EIS was excellent and the alternatives were clearly presented -- a job well done. Thank you for your consideration.

Sincerely,

Nancy Pitblado
1122 Garfield St
Helena MT 59601
Npitblado@mt.net
406.449.0333

Response to Comment #36

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Comment #37: Pat Foster

Studt, Mark

From: Foster, Pat
Sent: Monday, April 07, 2003 2:37 PM
To: Studt, Mark
Cc: Brian Shovers; Carol Strizich; Curtis Larsen; John Wheeler; Jue Sing; Lynda Blades; Michael Sullivan; Monte Nick; Rebecca Cooper; Rebecca Dockter Engstrom; Rebecca Ridenour; Ron Wilson; Sally Hilander; Scott McCollough; Sundi West (E-mail); TJ Abbenhaus; Tom Stuber
Subject: TAWSE Comments I-15 DEIS

April 7, 2003

Mark Studt, Project Manager

Montana Department of Transportation

2701 Prospect Avenue

Helena, Montana 59601-9746

Dear Mr. Studt:

The Try Another Way State Employees Taskforce, (TAWSE), is a group of volunteer State Employees made up of representatives from each of the Montana State Agencies.

TAWSE was established under Gubernatorial Executive Order 6-94 to help reduce the impact of state employees workday travel. TAWSE volunteers work to promote and facilitate walking, biking, car pooling, van pooling, and public transportation among state employees. These efforts help to lower maintenance costs on streets and roads, decrease traffic congestion and reduce pollution while promoting healthier life styles.

In TAWSE's review of the I-15 DEIS, we are extremely pleased to see the overall attention afforded alternative travel modes in both Alternative 1 and Alternative 2. Both alternatives express the need to safely accommodate walking and biking as well as the need to remove I-15 as a barrier to those who

Comment #37 continued

walk and bike.

In the TAWSE analysis of which alternative best addresses the mission of the organization, we have unanimously chosen to support Alternative 2, (Forestvale), for the following reasons.

1. Establishing an interchange at Custer Avenue as indicated under Alternative 1 would further compress and congest the traffic in the Frontage Road / York Road area and create additional commuting problems for the East Helena Valley, York, Lakeside and Canyon Ferry Road.
2. Alternative 1 would exacerbate the continuing congestion at the Montana Avenue and Custer Avenue intersection and further degrade the areas safe accessibility to alternative travel modes.
3. Alternative 1 would advance, rather than reduce, commuter traffic volumes along Montana Avenue between Cedar and Sierra Road causing further deterioration of safe bicycle and walking opportunities in the area.
4. Alternative 2 would serve to divert more traffic from Montana Avenue to I-15, providing better long-range distribution of traffic.
5. Alternative 2 has the strong potential to stimulate an additional east-west corridor for the East Helena Valley, which would provide better distribution of traffic making all of the affected area safer for motorized and non-motorized travel modes.
6. Alternative 2 would provide additional alternate routing for enhanced use of the Frontage Road and help mitigate the traffic load on Montana Avenue.

Another area that TAWSE would like to comment on is the importance of Transportation Demand Management (TDM), as brought forth in Chapter 4, Pages 41 – 43 of the DEIS. As noted in the study, TDM provides effective focus and forum for helping to more successfully implement the changes the study recommends. Funding and support for a Helena based Transportation Management Association, (TMA), should be an integral part of the final EIS. This would greatly help to ensure that implementation of either alternative is effected in close congress with the overall transportation needs of the community as well as help to enhance resource for obtaining alternative funding for improved traffic management in the Helena area.

Thank you for the opportunity to comment on this draft environmental impact study. Please feel free to contact me should you require any clarification in regard to the comments provided here.

- Patrick L. Foster, TAWSE Chair

Try Another Way State Employees Task Force
P.O. Box 4210, 111 Sanders Street.
Helena, MT 59604

(406) 444-4130
pfoster@state.mt.us

Response to Comment #37

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The six points are addressed in one response. In very general terms, the population/employment of the Helena Valley is forecasted to grow by about 50% by 2025. This resulted in about a doubling of traffic volumes using the major roadways in Helena by 2025 (regardless of the alternative). The design of both build alternatives considered the increased traffic load so that the Custer interchange would be sized to accommodate 2025 traffic volumes. Therefore, improvements are included with the Custer interchange alternative to improve the area east of the proposed interchange (York Road, Washington St., Frontage Road).

As discussed in Chapter 4.0 of the DEIS, with all alternatives (including No-Action) the traffic volumes at the Custer/N. Montana Avenue intersection will be nearly the same and require generally the same level of improvements. The traffic volume on N. Montana Avenue was not substantially reduced with Alternative 2 compared to Alternative 1; both volume levels will be high enough that the congestion levels will be similar with either build alternative. In fact, the traffic volumes on N. Montana Avenue near Forestvale Road would increase in Alternative 2. Whether traffic volumes increase on the east side Frontage Road or on N. Montana Avenue, the traffic volumes on each roadway in all alternatives (including No-Action) are at levels that would indicate further improvements should be considered, such as turn lanes, traffic signals, minor or major widening, etc., so there may not be an advantage to routing traffic to the Frontage Road versus to N. Montana Avenue.

Response to Comment #37 (continued)

The EIS fully considered the available community plans, and none of those plans identified an east-west road corridor on Forestvale (beyond what is already constructed).

TDM opportunities will exist in the future; however, it is unlikely that TDM alone could offset the substantial growth in traffic demand that will occur in the future. TDM was not included as a supporting element with the build alternatives primarily because these measures would have done very little to address the existing and projected needs in the study area and they received minimal support relative to other proposed improvements. Voluntary TDM applications are an important component of the transportation needs of any community, and they should be incorporated at appropriate levels as determined by the local communities and employers. TDM measures are recommended for consideration as part of all future local and regional planning efforts.

Comment #38: Norm Mullen

Studt, Mark

From: Lee hayes [leonthebus@hotmail.com]
Sent: Monday, April 07, 2003 4:56 PM
To: mstudt@state.mt.us
Subject: I-15 study EIS

Dear Mr. Studt:

I am writing to comment on the I-15 study. I support a Custer alternative and oppose a Forestvale project. If an intersection must be built, it makes sense to build it near the city, where service exist or are close by. Please do not encourage leap-frog growth and sprawl by building an interchange at Forestvale.

I support the comments submitted by Plan Helena.

I urge you to require adequate bicycle paths and routes. The Cedar and Hwy 12 overpasses are very difficult and dangerous to use on a bicycle, especially in winter. Please make wide and safe bicycle routes an integral part of any new interchanges.

Thank you,

Norm Mullen
7 Harrison Ave.
Helena MT 59601

Response to Comment #38

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes a new interchange at Custer Avenue, has been identified as the Preferred Alternative in the FEIS. All improvements under this alternative include safe and wide pedestrian and bicycle facilities.

Comment #39: Keith Carparelli

Studt, Mark

From: ru4griz@netscape.net
Sent: Monday, April 07, 2003 11:47 AM
To: mstudt@state.mt.us
Subject: I-15 Corridor Comment

Mark,

As a daily user of the I-15 corridor and likewise a victim of the congested infrastructure at the capitol interchange I am very concerned about the options and the phases of any build alternative associated with the project. I use the Montana city and capital interchange daily on my commute from Montana City and encounter the dangerous conditions of the capital interchange every day. A non-build is not a real option in my opinion and should not even be considered. This has been let go until it is a crisis and it will be worse before any real gains can be seen from projects. I have been a resident of Helena since 1976 and have seen the steady growth overwhelm the infrastructure with solutions always being to-little to-late.

I support Alternative 1, provided that sufficient bike/ped infrastructure are present. My experience in the past is that alternative transportation usually get forsaken in Helena for some reason. Other options such as a park and ride or something other mode of transportation from the Montana City and North Valley area could solve much of the congestion too with an immediate impact. Of all the options that will solve some of the congestion at the capital interchange finishing the frontage road from Montana city would have the most immediate gains (in my opinion). I believe most of the traffic would move from I-15 to the frontage road for those who go to the capital complex or like me to the higher ed building/hospital area. This has an obvious impact on Broadway and Wynne streets, however most of the traffic is already there, just the access point is changed.

I am very concerned about issues a forestvale exit (alternative 2) would cause with growth and therefore infrastructure of sewage treatment etc. A potable water system will also be a huge issue as wells quickly dry up or get contaminated. Custer avenue is already a huge area of retail growth and with Home depot etc. the overpass and traffic in that area will be overwhelming if that is not part of the near term fix. Custer also lends itself well to a corridor to hwy 12 west later on.

I 15 is a huge barrier to those of us who bike or walk. There are no safe ways to cross it at this point. I use the underpass on boulder street frequently and think if paved it would solve the same problem as a Broadway underpass for bikes/peds and some traffic without the cost. This would be a quick easy fix for bike/ped.

Thanks for the opportunity to comment. Again if you are counting the support I am definitely in favor of alternative 1, with sufficient bike ped facilities.

sincerely
Keith Carparelli

Response to Comment #39

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

Bicycle/pedestrian facilities are included as part of every reconstructed or new crossing of I-15 in the corridor.

Comment #40: Robert Rasmussen

Comment #40 continued

April 7, 2003

Mark Studt
MT Dept. of Transportation
2701 Prospect Avenue
Helena, MT 59601

Subject: **Comments on Draft EIS for I-15 Corridor**

Mr. Studt:

Please consider the following comments on the Draft EIS for the I-15 Corridor. In addition to these comments, there are a number of errors, omissions, or typos that occur in the document. It is too labor-intensive to list them all here, but it would improve the credibility of the document to give it a thorough proof.

1. Based upon the two alternatives presented, it appears that Alternative 1 provides the most benefit to the system and is the most compatible with locally adopted comprehensive plans, capital improvement plans, and other documents. However, the scale and expense of either alternative is so large as to render them politically/economically unfeasible. It will be important to develop a phased approach to implementation so that individual elements can be completed in a transportation-efficient and cost-effective manner. The timing and sequencing of phases will need to be evaluated so that the incremental improvements complement the system and do not create adverse impacts elsewhere in the system. In fact, some incremental improvements may be effective enough to improve the LOS sufficiently to allow time to develop the additional funding necessary for complete implementation.

2. The Broadway underpass is a very cost efficient improvement and I was disappointed to see it fall out of the mix of supporting elements. This is one of those improvements that would have multiple benefits of connectivity across the I-15 barrier. Previous traffic modeling indicated that it would also provide significant benefits to the Capitol interchange; however, traffic calming devices may be necessary to mitigate potential impacts to local neighborhoods.

3. There is an improvement described as the Railroad Avenue extension (Helena Area Transportation Plan) that has not been included as a supporting element. This is an urban arterial connection that would provide an improved connection between the east and west sides of I-15, utilizing an alignment under the railroad overpass north of the Capitol interchange. This connection would create another route under the Interstate to reduce congestion at the Capitol interchange. It would also provide excellent access to an area designated for development in community plans.

4. TDM does not seem to be adequately addressed. It seems that this approach could have significant impact on peak travel periods, which is when LOS declines and for which improvements are designed. Current congestion at the Capitol and Cedar St. interchanges is greatest during rush hours. If MDOT and the local governments cooperatively embraced TDM, the existing infrastructure or scaled back designs of the alternatives could achieve improved

LOS. Given the huge price tag for the proposed improvements, I think this approach could be further evaluated and additional supporting TDM elements included.

5. The cost estimates are mind-boggling, given the historic and anticipated availability of financial resources. It seems that few of the improvements would ever be constructed under current funding structures. Are the cost estimates accurate? Is the assessment of funding alternatives accurate?

6. Although the Forestvale interchange is not an effective or appropriate system improvement at this time, it is possible that this facility will have value beyond the current planning horizon. Therefore, the already acquired r-o-w should be kept in State ownership and not declared surplus property. This would preserve the investment to date without creating an ill-timed improvement that does not conform with local planning documents.

Thank you for the opportunity to comment.

Robert Rasmussen
325 Holter Street
Helena, MT 59601

Response to Comment #40

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

We have addressed your six numbered comments as follows:

1. As noted above, Alternative 1 has been identified as the Preferred Alternative in the Final EIS. While preliminary assumptions of cost for the complete package of improvements are beyond MDT's projected revenue stream, every effort will be made to work with city and county officials and with the private sector to identify additional sources of funding. As you suggest, incremental or phased improvements will be carefully considered by MDT during the design process to help maximize the effectiveness of all available funds.
2. The traffic flow that a Broadway underpass would serve can also be served, although not as directly, by other methods, including the improvements planned for the Capitol interchange and the Colonial Drive connection.
3. The Railroad Avenue/Boulder Avenue connection under I-15 was explored with the city of Helena. The city had previously pursued acquiring right-of-way along the Railroad Avenue alignment but dropped the pursuit due to difficulties. In the traffic forecasting completed for this EIS, the connection was not forecasted to carry a substantial traffic volume, not nearly enough to offset increases in traffic at the Capitol interchange. The roadway underpass of I-15 at Boulder Avenue will remain open and will actually be enhanced when the I-15 bridges over the railroad are replaced. Therefore, there will be no impediments to the city reconsidering an improved connection in the future.

Response to Comment #40 (continued)

4. TDM opportunities will exist in the future, however it is unlikely that TDM alone could offset the substantial growth in traffic demand that will occur in the future, so it would not be possible to scale-back any designs that have been developed.
5. The preliminary assumptions of costs prepared for this EIS are intended to be conservative. The cost assumptions presented in the DEIS have been adjusted downward (see Table 2-4 in the FEIS) to reflect more accurate local costs for asphalt, traffic control and contingencies. These assumptions are subject to further refinement as the design of each improvement is more fully defined.
6. The Department of Transportation intends to retain the right-of-way near the Forestvale Road interchange location for the foreseeable future.

Comment #41: Clark Pyfer

Response to Comment #41

INTERSTATE 15 CORRIDOR
 Montana City to Lincoln Road

Public Hearing
March 11, 2003

3/11/03 COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I attended the meeting in Helena tonight and was disappointed that again no consensus was achieved. - We are going to "shoot up sides" & let someone else (like Bazeman did with the 14th St interchange!) "eat our lunch".

We will ignore Custer until someone is killed on that "death trap overpass" as we did at MacDonald in "Duland".

Then we will do it in a hurry.

We had a chance.

Let's show some team work - with the leadership of our elected officials.

Name: *CLARK PYFER*

Address: *Box 752 E.H. 59635*

Phone: *406 227-6287* e-mail:

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

C:\My Documents\I-15 Corridor Study\Comment\Comment4.doc

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The intent of the public hearing is to provide an opportunity for members of the public to make comments and ask questions. Subsequent to the hearing and the end of the comment period (April 7, 2003), consensus was reached in supporting Alternative 1 as the Preferred Alternative to be identified in the FEIS.

Comment #42: Nevin Guderian

Response to Comment #42



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I don't understand why the "Forestvale" interchange isn't moved to Sierra Rd where a "thru" route to Lakeside/York area by the county is much more likely.

If he was mentioned last night (3/11) the city and county should be involved in over-all planning for the valley much more.

The mess between I-15 and Montana Ave "on Custer" needs cleaned up. I assume this is city/county though. With Home Depot going into the area the Custer overpass needs to be a minimum of four lanes.

Name: *Nevin Guderian*
Address: *PO Box 340, East Helena, MT 59635*
Phone: *227-2664* e-mail: *teddygee@mail.montana.com*
(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The Forestvale location was selected over the Sierra location for a potential interchange due to adverse impacts that freeway ramps would cause on and near Sierra Road to the school, park and a historic property.

Proposed Custer reconstruction would include at least four lanes on Custer plus appropriate turn lanes at intersections.

Comment #43: Anonymous

Comment #43 continued

YOUR COMMENTS

Please take a few minutes to fill-in the information on your awareness and understanding of the preliminary alternatives. Simply check the boxes (and write any additional comments on the back), fold and fasten together, and mail back to us. Your comments are important and will be used in the further refinement and evaluation of these alternatives.

Question #1: How well do you understand the four preliminary alternatives under consideration for the I-15 corridor? (check one box)

- ☐ Understand Well ☐ Understand a Little ☐ Don't Understand ☐ Don't Know Anything about the Study

Question #2: How well do you think the preliminary alternatives address the transportation issues in the I-15 corridor? (check one box) *about as well as can be expected with what you have to work with.*

- ☐ Address Issues Well ☐ Address Issues a Little ☐ Don't Address Issues ☐ Don't Know if they Address Issues

Question #3: Which preliminary alternative location do you think best addresses the transportation issues in the I-15 corridor? (you may check more than one box)

- ☐ Northern Alternatives (Forestvale or Custer) ☐ Central Alternative (Capitol) ☐ Southern Alternative (Saddle)

Question #4: Are other improvements needed in the I-15 corridor? (check all that you think are needed)

- ☒ Lincoln Interchange Improvements *Very much needed - Blind when turn - into to Lincoln Rd.*
☒ Frontage Road East of I-15 extended North to Lincoln Avenue
☐ Additional I-15 Lanes between Capitol and Cedar Street Interchanges
☒ Widen Cedar Street to 5-Lanes between I-15 and N. Montana Avenue
☒ Improve Boulder Avenue under I-15
☐ Broadway Underpass
☐ Montana City Interchange Improvements
☐ Improve Truck Route/Bypass between I-15 and US 12
☐ Transit Routes and Park-and-Ride Locations *could happen someday*
☒ Sidewalks and Bicycle Lanes/Bikeways at I-15 Crossings
☒ Connect/Pave the Frontage Road West of I-15 to Colonial Drive
☐ Carpools/Vanpools and Flex-time Work Schedules
☐ Other: _____

Question #5: How valuable to you is this newspaper insert in learning more about the I-15 Corridor project? (check one box)

- ☒ Very Helpful ☐ Somewhat Helpful ☐ Of Little Value ☐ Not Worth the Time or Expense

Question #6: Do you have additional comments, questions, or concerns about the I-15 corridor study that you want to share with the Project Team?

My biggest concern is the lack of mutual city/county planning.

Thanks!

To comment further, visit the project website at www.I-15HelenaEIS.com or call the project hotline at 458-4789.

fold here

Response to Comment #43

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Comment #44: Anonymous

Response to Comment #44



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

Guster Ave. is the best choice.
 The meeting the other night
 at the Colonial was great except
 we couldn't hear!
 After the microphone was turned up
 once when you could almost hear,
 you could not hear the individuals
 that spoke - You would have thought
 that someone from your company would
 have seen to that.
 Why have a meeting and not have
 everyone hear to hear?

Name:	
Address:	
Phone:	e-mail:

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
 shaloukatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

We apologize for any inconvenience or frustration caused by the audio equipment used at the public hearing.

Comment #45: Dan Norderud



Public Hearing
March 11, 2003

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I support Alternative 1 for the very simple reason that it addresses critical access needs at Custer Avenue. Development has occurred in this area without convenient access. Custer is the logical place for future commercial development to happen and city infrastructure can be readily extended. It (Custer Ave Interchange) provides a logical connection to a major secondary highway - Forestvale does not.

My major concern with the selection of one alternative over another is what happens to Forestvale if Custer gets picked? The need for all these interchanges has been identified ~~for~~ since at least 1980 when the last I-15 Corridor Study was done. We still have the need for a mid valley interchange. - I hope that ^{whatever} ~~such an~~ interchange is not selected (either Forestvale or Custer) is not dropped from consideration.

Name: Dan Norderud
Address: 809 Hauser Blvd Helena
Phone: e-mail:

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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Response to Comment #45

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS. Identification of Alternative 1 does not preclude a future interchange at Forestvale.

Comment #46: John W. Herrin

Response to Comment #46



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

Prefer Alternative #1 - Strongly

1.) Capital Interchange @ ~ 40 million should be built first to fix largest Traffic bottleneck & have greatest over Traffic flow to heaviest use areas

2.) a.) Recommend widening 11th to 3 lanes into Capital interchange proposal to improve flow & bottlenecking (minimal cost since Pavement area there already). Also East. B lanes

b.) Complex Design of This Interchange proposal confuses most people unless Thoroughly explained, but it is well thought out & will greatly improve life in Helena & Innovative Design.

General Both Alternatives Go a long way to solving Helena area Traffic problems & I ^{strongly} commend your efforts. Let's just hope MDT/FHA can part with funds to get there done ASAP. Alternative 2 - Big Negative is Forestville does not have connecting E-W system of roads like Cedar. Forestville ^{also} does not have high value commercial development that Custer does.

Name: John W. Herrin
 Address: 212 State Street #1 Helena 59601
 Phone: 444-4633 (w) 442-2360 (H) e-mail: jherrin@state.mt.us
 (above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

11th Avenue (US 12 outbound) was planned as three lanes in development of the alternatives to Capitol. This would essentially be restriping in the first one or two blocks west of the Fee Street signal. The intersection at Fee St/11th Avenue will also have substantial improvements that allow more green-light time to be dedicated to eastbound 11th Avenue traffic.

Phasing of the various improvements has not been determined at this time and will be based on the availability of funding and coordination with the Montana Transportation Commission. See Section 2.11 of the FEIS for additional discussion.

Comment #47: Mark Gerl

Response to Comment #47



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

We have already moved from one neighborhood when business development encroached into residential area. Now the same thing is going to happen.

Why should I, as a resident of Helena, care a twit about the traffic problems that people who have chosen to live out of the city limits to avoid taxes have?

It gives one a warm, fuzzy feeling to know that the authors of the EIS care about the birds and bees in town. But how about the impact having travel racing to work ~~through~~ residential areas will have to the children who can no longer walk to ^{Smith} school? Who will pay for sidewalks? Certainly not those from Montana City, Clancy, etc. Helena citizens will be left to pick up the tabs for these free-loaders. Who will pay for street repairs caused by the increased traffic? Again, it won't be those who travel into town from Clancy, Montana City, etc.

Name: *Mark Gerl*
Address: *700 Red Letter*
Phone: *443-4607* e-mail: _____

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The DEIS compared the potential traffic changes on Broadway with either build alternative against a No-Action Alternative. The potential traffic volume changes (increases and decreases) on Broadway and other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway.

Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. These studies indicate that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The origin/destination studies also indicate that most traffic accessing the State Capitol offices via the Capitol interchange are using Prospect Street to Lamborn Street.

Our studies, which very carefully considered potential impacts to residential neighborhoods throughout the study area, do not indicate any significant changes in traffic volumes along Broadway or the surrounding neighborhood streets resulting from the I-15 Corridor improvements described in the DEIS. Accordingly, we do not believe that traffic mitigation measures are required to offset impacts associated with our project.

Comment #48: Charlie McKenna



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I don't have a strong opinion on whether to build an interchange at Forstvale or Custer, but I do think one should be built. The 1st priority should be to rebuild the Capital interchange - it is very dangerous & causes ~~many~~ delays. The 2nd priority should be to build the new interchange ~~that~~ the 3rd priority should be the improvements at Lincoln Rd & MT City. The last (lowest) priority should be to build the new South Helena interchange. The improvements at the Capital interchange will ~~not~~ ^{not} meet the need for the South Interchange for into the future (or never). Remember the #1 priority should be to fix the wreck at the Capital Interchange.

Name: Charlie McKenna
 Address: 608 Brokenridge, Helena, MT 59601
 Phone: 449-7509 e-mail: cmckenna@univis.net
 (above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
 halouskatk@c-b.com.

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Response to Comment #48

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

An important component in determining project phasing is knowing what the ultimate design will be for each of the proposed improvements. For larger and more complex improvements such as the Capitol interchange, phased construction will likely require several years, with some parts of the interchange being open before other parts. Phasing will be determined for each project based on available funding, ability to accommodate traffic during construction, priority needs within the corridor, and many other factors. We appreciate receiving your recommended prioritization.

Comment #49: R. Dunlop



Public Hearing
March 11, 2003

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

1. Go with Forestvale NOW.

2. Don't wait for more studies
+ Funding and not one
promise of a road

Name:	R. Dunlop
Address:	5820 N. Montana Ave
Phone:	458-4714
e-mail:	

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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Response to Comment #49

The Federal Highway Administration and the Montana Department of Transportation thank you for your comments on the I-15 Corridor EIS. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Comment #50: Chuck Watters



Public Hearing
March 11, 2003

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I support alternative #1 which would include a new interchange at Custer Avenue. This area is becoming a major commercial development area which a new interchange would complement.

Also, large numbers of new houses in the Skelton/Anderson developments are being built. These people and traffic would benefit from the Custer Avenue interchange. Increased traffic funneling into Custer Avenue from Green Meadows and McHugh are making Custer Avenue very busy. Widening Custer and a new interchange seem necessary to me.

Name:	Chuck Watters
Address:	3595 RIMINI ROAD, HELENA 59601
Phone:	443-5429
e-mail:	

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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Response to Comment #50

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS for many reasons, including those identified in your comments.

Comment #51: Robert W. Mullenix




**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

Some positives I see in the preferred alternative:
Capital Interchange improvements - these are the highest priority of all the projects to me.
Custer Interchange - This makes good economic and development sense at this time.
South Helena Interchange and West side Frontage road development. This shows good planning to handle the ever increasing population of N. Jeff Co. This interchange should also include an east-side frontage road from Walmart light south to the road from East Helena to South Hills Road.
Improvements @ Lincoln Rd @ Mt. City will help with safety and improve traffic flow.
I would like to see the S. Helena Interchange closer to the hospital (Winnic/Broadway area) or have it tie into Saddle Drive.
This looks like a good plan for what you have to start with and all concerns involved. Thanks

Name:	 Robert W Mullenix 11 Crazy Mountain Rd Clancy MT 59634
Address:	
Phone:	e-mail: m11nxbj@cs.com

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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Response to Comment #51

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

The proposed development area between I-15 and US 12 (Southeast Helena Planning Area) may include some roadway connections that provide a portion of east-side roadway connections but no east side Frontage Road is proposed. The South Helena interchange connection was adjusted during the process to connect primarily to the west Frontage Road/Colonial Drive in order to serve the employment base in the hospital area and minimize traffic intrusion to residences along Saddle Drive.

Comment #52: Wally Bell



Public Hearing
March 11, 2003

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I think Alternative 1 is the
way to go. Let the ones with
the vested interest help pay
for Custer - & the South Interchange

Name:	WALLY BELL
Address:	647 TAMMACH
Phone:	406-2591
e-mail:	

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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Response to Comment #52

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

Comment #53: Terry Dimock

Response to Comment #53



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I support the interchange recommendations as proposed. My preference would be for Alternative #1 or Custer interchange.

I reside near St. Pete's and am concerned with the traffic increases to Broadway and Winne.

Connection with the westside frontage road from S. Helena interchange needs to be better directed to Colonial Drive to discourage traffic through the eastside neighborhood.

Name: <i>Terry Dimock</i>	
Address: <i>422 Graham St., Helena</i>	
Phone: <i>442-8082</i>	e-mail:

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

The potential traffic volume changes (increases and decreases) on Broadway or other streets in the hospital area are not substantial when compared to the No-Action Alternative. The hospital area is forecasted to continue growing in the future regardless of any improvements to I-15 to provide a substantial employment base at the east end of Broadway. Origin/destination studies conducted on Broadway during the EIS process determined that there is substantial traffic volume using Broadway to connect from the hospital area to downtown Helena and other locations in West Helena. These studies indicate that a substantial portion of the traffic volume on Broadway is not at all related to I-15 access. The South Helena interchange connection was adjusted during the process to connect primarily to the west side Frontage Road/Colonial Drive in order to serve the employment base in the hospital area and minimize traffic intrusion along Saddle Drive and other residential streets.

Comment #54: David S. Johnson

Response to Comment #54



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I have a design concern for the Capitol Interchange improvement. We improve the access to the hospital area and this rapidly developing area, but there is NO WAY BACK OUT! Some ramps on the Broadway underpass for egress would seem to be a possibility.

Custer makes more sense for a northern access point FOR THE NEAR FUTURE.

Name: *DAVID S JOHNSON*
Address: *1921 EAST 6TH AVE, HELENA*
Phone: *DSJ@MCM.NET* e-mail: *442-8316*
(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The Capitol interchange reconstruction includes substantial improvements and new routes for inbound traffic to the hospital area. For outbound traffic, it was determined through the evaluation of several alternative configurations that the outbound traffic volumes could be accommodated by a combination of widening 11th Avenue (westbound) to two lanes, and making improvements at the Fee Street/US 12 intersection to allow free-flow for the outbound traffic. Public road connections using a Broadway underpass were explored, but those alternatives were eliminated due to concerns about traffic impacts to the residential section of Broadway.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

Comment #55: Mike Hay



Public Hearing
March 11, 2003

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I prefer Alternative (one)
Custer is far superior to Forestvale

Name: Mike HAY	
Address: 1900 Highland	
Phone: 4436072	e-mail:
(above information is optional)	

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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Response to Comment #55

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

Comment #56: Tiffany Sauer

Response to Comment #56



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I LIVE ON PRONGHORN DRIVE, 1 SHORT STREET OVER FROM CAPITAL DR WHICH STARTS AT THE OVERPASS TO SARCO & UP FROM MT CITY WEST JUNCTION. "THE BACK ROAD" TRAFFIC HAS INCREASED DRAMATICALLY IN THE LAST 3 YEARS-AS MT CITY VEHICLES DRIVE DAILY INTO HELENA- & THE SPEED OF MOST OF THESE VEHICLES HAS INCREASED TOO MUCH FOR SAFETY. THE RESIDENTS OF OUR NEIGHBORHOOD ARE CONCERNED FOR THE SAFETY OF OUR CHILDREN & OURSELVES AS SPEEDING VEHICLES DRIVE TOO CLOSE TO THOSE 3 HOMES WHO SHARE THEIR YARDS WITH THE ROAD'S SAGE. WHILE I UNDERSTAND THAT THE "BACK ROAD" WILL MOST PROBABLY BE COMPLETED, HAS ANYONE SUGGESTED PAVING A FRONTAGE ROAD WITH 55 MPH ON THE EAST SIDE OF THE INTERSTATE INTO HELENA FROM THE OVERPASS? THERE ARE NO HOMES ON THE EAST SIDE AT THIS TIME; THOSE HOMES THAT IMMEDIATELY ADJOIN THE "BACK ROAD" NOW WILL SURELY FACE DEVALUATION OF THEIR PROPERTY IF A PAVED ROAD RUNS THE PROPOSED COURSE.

Name: <i>TIFFANY SAUER</i>	
Address: <i>5 PRONGHORN DR CLANBY MT 59634</i>	
Phone: <i>459.2855-W</i>	e-mail:

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

In the early stages of developing potential transportation improvement options, other frontage road connections and locations were discussed. Completion of the west side Frontage Road between Montana City and Colonial Drive was identified as the only location that effectively addressed the purpose and need for the project as described in Chapter 1.0 of the Draft and Final EIS.

Jefferson and Lewis & Clark Counties have worked jointly with MDT to establish an alignment and right-of-way for the west side Frontage Road that is directly adjacent to the I-15 right-of-way, except at the far north end where it would reconnect to Colonial Drive. The realigned roadway is nearly completed as a county-standard gravel road, so the supporting element identified in the EIS is to pave the roadway to accommodate the traffic demand anticipated. At the South Helena interchange, the Frontage Road would re-align west about 750 feet to allow adequate distance between the Frontage Road intersection and the intersections for the ramps. MDT will conduct additional analysis of property impacts during final design to see if potential impacts of the re-alignment of the Frontage Road can be reduced.

Speed limits along the completed west side Frontage Road will be set and enforced by the city or county with jurisdiction. Safety of both the motorist and persons living along the roadway are both considered in setting the posted limit.

Comment #57: Bernard L. Adams

Response to Comment #57



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

Alternative #2 Forestvale will have the greatest direct impact on the most people. Custer will only benefit a few businesses but does little to relieve pressure on N. Montana N of Shopto. Forestvale interchange effectively spread out traffic on the underutilized 4 miles of Interstate 15. With the Capital improvements, better traffic flow will result.

Custer will push more traffic onto an I-15 stretch that is already reaching capacity.

At peak times of the morning drive on N. Montana traffic is backed up to the Cemetery. Custer would not relieve this problem. Forestvale would.

Forestvale is already prepped for construction. Land purchased and layout. Custer would still need to have land condemned, prep the land, major re-route of several roads.

Name: Bernard L Adams
Address: 5645 Empire Ct
Phone: 406-458-5985 e-mail: Bernie @ qmc-hm.com
(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Neither alternative provided a substantial benefit to traffic on N. Montana Avenue when compared to the No-Action Alternative. Both alternatives increase the traffic use of I-15; the increase with Custer is greater. Each alternative includes improvements to I-15 such as auxiliary lanes to mitigate the impact of increased traffic.

Some property acquisition is likely going to be required at the Custer interchange as described in Section 5.3.6.1 of the Final EIS. Right-of-way acquisition will occur during the final design process. Minor roadway improvements will occur to improve overall safety and operating conditions in the interchange area. Major rerouting will not be required.

Comment #58: Paulette Adams



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I believe the Forestvale Interchange is the best alternative because it will
1) alleviate traffic on Montana Ave
2) provide bike paths & easy access to children crossing Montana at Forestvale to get to Rossiter School.
3) Provide better & safer access to Rossiter School for children across the interstate off of the Frontage Road - (Pleasant Valley Subdivision)

The Custer ave. interchange will expand the tax base for the city & benefit a few big business owners - it will not alleviate the traffic congestion on Montana from Mill Road to Cedar Road. nor will it provide safer access for children.

Name: Paulette Adams	
Address: 5645 Empire Ct Helena MT 59602	
Phone: 458-5995	e-mail: padams@amc-hln.com
(above information is optional)	

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.
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Response to Comment #58

The Federal Highway Administration and the Montana Department of Transportation thank you for your thoughtful comments on the I-15 Corridor alternatives. After very careful consideration of both build alternatives and the No-Action Alternative, Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative.

Neither alternative provided a substantial benefit to traffic on N. Montana Avenue when compared to the No-Action Alternative. Improving pedestrian access to the Rossiter School should be accomplished by a combination of better sidewalks/paths and signalized intersections to assist in the crossing of Montana Avenue at Sierra Drive, for example. These local improvements will likely be done at the county level.

Comment #59: Marga Lincoln

Response to Comment #59



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

- I support Alternative 1, because it*
- 1) ~~It~~ best matches the current Growth Policy.*
 - 2) I believe a strong element has to be funding of Transportation Demand Management to remove vehicles from the roadway. Helena is ideally situated to encourage TDM (12,000 workers go to 15 job sites).*
 - 3) This needs to truly be a multi-modal project in keeping w/ the intent of TEA-21. Bike + ped facilities need to be high priority projects. This can't just be interchanges w/ disconnected fragments of sidewalks + bike trails.*
- The Public opinion survey showed strong support*
- | | | |
|--------------------------------|---------------|--|
| Name: | Marga Lincoln | <i>for
Bike
ped,
transit</i> |
| Address: | 220 Adams | |
| Phone: | 452-1443 | |
| e-mail: hofflin@ixl.net | | |
- (above information is optional)

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

TDM opportunities will exist in the future; however, it is unlikely that TDM alone could offset the substantial growth in traffic demand that will occur in the future. TDM was not included as a supporting element with the build alternatives primarily because these measures would have done very little to address the existing and projected needs in the study area and they received minimal support relative to other proposed improvements. Voluntary TDM applications are an important component of the transportation needs of any community, and they should be incorporated at appropriate levels as determined by the local communities and employers. TDM measures are recommended for consideration as part of all future local and regional planning efforts.

All new or reconstructed infrastructure in the I-15 Corridor is planned to have pedestrian/bicycle facilities. In particular, a new pedestrian/bicycle underpass is planned at Broadway. The Helena Non-Motorized Transportation Plan also proposes pedestrian/bicycle facilities that fit in with the proposed EIS improvements.

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.
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Comment #60: Jim Nolan

Response to Comment #60



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I TOTALLY SUPPORT
THE SOUTH HELENA
INTERCHANGE & PAVING
THE FRONTAGE ROAD
TO COLONIAL DRIVE

Name: JIM NOLAN	
Address: 801 S. CALIFORNIA HELENA	
Phone: 443-3670	e-mail:
(above information is optional)	

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS. This alternative includes an interchange at Custer Avenue, an interchange at South Helena, improvements to the Capitol interchange, Lincoln Road interchange improvements, Montana City interchange improvements, connection of the west side Frontage Road between Montana City and Colonial Drive, widening Cedar Street to five lanes from I-15 to N. Montana Avenue, and a Broadway underpass for pedestrian and bicycle use. The improvements include pedestrian and bicycle facilities as well.

Comment #61: Anonymous

Response to Comment #61



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

*I support Alternative I (Custer, Capitol + Saddle).
 In my opinion it is the sensible place to ~~have~~ have a
 new, northern interchange.*

*The growth that is currently taking place on Custer
 Avenue and in the area of the intersection with Montana
 Avenue is reason enough to choose this Alternative. Moreover,
 the access to the airport, the fairgrounds, York and
 Canyon Ferry Roads and Montana Ave provide several
 more reasons for choosing this alternative.*

*Finally, the costs associated with Forestvale -
 costs including the need to purchase ROW, repair
 (all of) the approach roads to the area and the
 lack of infrastructure (water, sewer, etc...) make
 Alternative II a bad choice.*

*(p.s. to address the safety issues on Forestvale,
 a remote controlled gate could be placed on
 the Interstate allowing emergency vehicle access to
 the Frontage Road.*

Name: *[Redacted]*
 Address: *[Redacted]*
 Phone: *[Redacted]* e-mail: *[Redacted]*

(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
 halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of
 Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1 has been identified as the Preferred Alternative in the FEIS.

The idea of a remote-controlled emergency gate allowing emergency
 vehicles onto I-15 was explored with FHWA. FHWA generally prohibits
 such access for permanent installations. In general discussions about the
 subject, it was suggested that the cost of a gate, an access drive, and
 maintaining the access and gate might be similar in some cases to
 moving the fire station or providing a satellite fire station.

Comment #62: Janice Frisch

Response to Comment #62



**Public Hearing
March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

It seems primary concern should be the safety & health of citizens.
Have you ever watched an ambulance sit on the overpass at the Capitol interchange?
Have you watched an adult try to walk across the Capitol interchange at 5:30 in December with snow & ice on the road?
Or most frightening - a child riding his bike on overpass on Custer?
How much have we lost in car accidents on both of these interchanges because traffic is backed up so long?
Seems we need to fix our infrastructure before we create more growth & more problems. Bigger is not always better. That alternative 1 seems more sanctioned.

Name: Janice Frisch	
Address: 1517 Waukesha Helena, MT 59601	
Phone: 406-320-9777	e-mail:
(above information is optional)	

Mail comments to address on other side or fax to 406/458-6238 or e-mail to halouskatk@c-b.com.

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The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The alternatives that were developed primarily address replacement and upgrading of the existing infrastructure to meet modern standards and future needs. In particular, replacement of the Capitol interchange and replacement of the Custer bridge over I-15 address these issues.

Alternative 1 has been identified as the Preferred Alternative in the FEIS. This alternative includes an interchange at Custer Avenue, an interchange at South Helena, improvements to the Capitol interchange, Lincoln Road interchange improvements, Montana City interchange improvements, connection of the west side Frontage Road between Montana City and Colonial Drive, widening Cedar Street to five lanes from I-15 to N. Montana Avenue, and a Broadway underpass for pedestrian and bicycle use. The improvements include additional pedestrian and bicycle facilities as well.

Comment #63: Dan Edens

Response to Comment #63



**Public Hearing
 March 11, 2003**

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

I would like comment about the options for the two proposals. I am in favor of option one, the Custer exchange. If forestland were to be built there would be significant development in that area, but there is no infrastructure to support it where Custer Ave has all required infrastructure for supporting increased development.

Name:	Dan Edens	
Address:	1825 E Sierra Rd Helena	
Phone:	458-5317	e-mail: edensdan@minico.net
(above information is optional)		

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
 halouskatk@c-b.com.
C:\My Documents\15CorridorStudy\Comment\Comment1.doc

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer interchange, has been identified as the Preferred Alternative in the FEIS.

Comment #64: Mr. & Mrs. Gerald Charlton



Public Hearing
March 11, 2003

COMMENT SHEET

I have the following comments, questions or concerns about the I-15 Corridor, Montana City to Lincoln Road Environmental Impact Statement:

The Number 1 & 2 projects should be the Custer interchange & the redo of the Casper interchange as you have designed, with med & bike path under pass (must be well lighted and with cameras to protect the people).

Gerald Charlton

1. alternate would be to put Broadway as a one way going east and a med & bike path underpass

Name: Gerald Charlton & wife
Address: 110 S. Harrison Helena MT 59601
Phone: 406-462-7077 e-mail:
(above information is optional)

Mail comments to address on other side or fax to 406/458-6238 or e-mail to
halouskatk@c-b.com.

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Response to Comment #64

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes a new interchange at Custer Avenue, has been identified as the Preferred Alternative in the FEIS.

Phasing of the various improvements has not been determined at this time and will be based on the availability of funding and coordination with the Montana Transportation Commission. See Section 2.11 of the FEIS for additional discussion.

A new pedestrian/bicycle-only underpass is planned at Broadway. Public road connections using a Broadway underpass were explored, but those alternatives were screened-out in the process due to concerns about traffic impacts to the residential section of Broadway.

Comment #65: Robert Rule

I recommend the Custer Avenue Interchange because it will allow economic growth. According to the City of Helena Growth Plan, the areas on the east side of I-15 on Custer Avenue has been designated Commercial/Industrial. It is the only area left in Helena with that zoning classification that has any sizable lots available. I have secured commitments from several major corporations while developing 270 acres of property on Custer. Custer Avenue is on the verge of an irreversible explosion in growth similar to what we have seen on Reserve Street in Missoula.

We are in the process of implementing a plan that could take care of the traffic impact for the immediate future, but the Interchange will be required for the final phases that will create hundreds of high paying jobs.

The tax base created from these series of developments can and will impact the City, County and State revenues that will enable the Forestvale Interchange to be completed in addition to the Custer Avenue Interchange.

X While the Forestvale Interchange will be great for the convenience of people, Custer Avenue will create jobs.

Furthermore, Our rerouting of the Frontage Road Access onto Custer will allow travel from the valley residents near Sierra Drive to use the Frontage Road without being required to re-enter Montana Avenue.

ROBERT RULE
(406) 227-2601

Response to Comment #65

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

Alternative 1, which includes the Custer Avenue interchange, has been identified as the Preferred Alternative in the FEIS.

Comment #66: Jennifer Dalrymple

-----Original Message-----

From: dymples5@starband.net [mailto:dymples5@starband.net]
Sent: Thursday, April 10, 2003 12:29 PM
To: mstuds@state.mt.us
Subject:

Mark,

I have not taken the opportunity to directly review the I-15 EIS, but I have heard/read comments about it. I would like to offer a few suggestions for document/background review on some of the options. MDT completed a Capital Interchange analysis and review in 1982 which mentions immediate need for pedestrian/bicycle facilitation for that area. There are videotapes of peds/kids jumping the I-15 fence...temporary solution was MDT grated a dirt roadway down to the south 6' drainage culvert, which is now barred closed on the west side. Planning Division, Dick Turner or Carol Strizich should still have this report/info.

In 1998, Jason Giard did a thorough review and preliminary cost analysis/design for a ped/bike overpass for Capital interchange and ped/bike tunnel for Broadway. Don Dusek(engineering) also worked with the neighborhood adjacent to Broadway to brainstorm ideas for traffic calming if Broadway were to be motorized under I-15.

From 1997-2000, I compiled a complete folder for I-15 ped/bike opportunities and had signed petitions for support of a ped/bike overpass or underpass for the I-15 Capital interchange area. I worked closely with Jason and the Butte District to get a project in the STIP for something for ped/bike across I-15. Carol Strizich, non-motorized program coordinator should have this info now.

In my experience as the State MDT non-motorized program coordinator for over three years, the barrier to ped/bike travel caused by I-15 is significant. As an avid cyclist and ardent pedestrian who used to cross I-15 everyday, walking or biking, I saw firsthand the frustrations of other pedestrians/bicyclists who dared to traverse this barrier. Many, fearful for their lives, either ended up choosing to drive, increasing congestion or not cross at all. Especially impacted were the folks trying to get to the bus terminal which moved from downtown Helena to what is now Concoco across I-15.

I urge you to seriously consider multi-modal crossings of I-15 as well as lateral travel on both sides as you seek to improve the corridor. As the original designers of the Capital interchange now say, 'who could have predicted the needs and extreme growth of this entire area. That interchange won design awards for it's ingenuity and visionary design. We never expected growth down/along hwy 12/287.' As we know now, growth will happen on both sides of any major transportation route whether it be river, rail or roadway, and incorporating all modes of travel up front is the smart choice for the future.

Thank you for reading this long-winded commentary and if you have any questions/comments, please feel free to contact me.

Jennifer Dalrymple
949-2300

Response to Comment #66

[Note: Comment received after the 45-day comment period ended on April 7, 2003.]

The Federal Highway Administration and the Montana Department of Transportation thank you for your informative background information on Multimodal planning in the I-15 Corridor. The Preferred Alternative identified in the Final EIS incorporates new or improved facilities for bicyclists and pedestrians at five interchange locations between Montana City and Lincoln Road. The Preferred Alternative also includes a new bike/ped underpass at Broadway.

Throughout the development of the EIS, the need for improved safety and mobility for bicyclists and pedestrians was a constant theme. The Preferred Alternative makes major advances in this area.

Comment #67: Karen Marble

-----Original Message-----

From: No_email_address_supplied
[mailto:No_email_address_supplied]
Sent: Monday, July 14, 2003 2:00 PM
To: rcash@state.mt.us; cstephenson@state.mt.us
Subject: guest book entry

WWW.MDT.STATE.MT.US GUEST BOOK ENTRY:

Karen Marble

3504 Pondera Road

Helena, Montana 59602

Hello, I hope this is the correct place for input on the proposed interchange on Custer Ave for Helena. I drive Custer Ave every morning to work and to Helena businesses. The traffic on Custer, Montana Ave. and Washington Street is very condensed at present. I cannot imagine trying to make a right or a left turn onto Custer and beyond if an interchange were to feed into that same area, especially with more business traffic feeding into the area when Home Depot is complete. I don't know the alternate but I thought you need some more insight into this interchange proposal.

Book signed on Mon, Jul-14-2003 at 14:00:19

Response to Comment #67

[Note: Comment received after the 45-day comment period ended on April 7, 2003.]

The Federal Highway Administration and the Montana Department of Transportation thank you for your participation in the I-15 Corridor EIS.

The Preferred Alternative identified in the Final EIS includes a new I-15 interchange at Custer Avenue. In order to address your concerns and other potential issues at Custer Avenue, Washington Street, and N. Montana Avenue, the Preferred Alternative includes a number of intersection and roadway improvements that will address safety, mobility and general traffic operations. These improvements are fully described in Section 2.8.2.3 of the Final EIS.